



F.E.D.I.A.F.

**CODE OF GOOD LABELLING
PRACTICE FOR
PET FOOD**

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Code of Good Labelling Practice for Pet Food

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1. INTRODUCTION

FEDIAF represents the national pet food industry associations in the EU and from Bosnia-Herzegovina, Croatia, Norway, Serbia, Switzerland and Russia, and is the spokesman for approximately 650 companies across Europe.

Feeding pet animals with safe pet food for a long healthy life is the prime objective of the European pet food industry.

In order to achieve this, FEDIAF and its members are concerned with the entire manufacturing process through to the placing on the market of pet food and providing relevant information for the ultimate customer.

Information about pet food can be provided to the customer in various ways, notably on-pack via indications on the labelling and packaging and off-pack by means of leaflets, websites, advertising in print media and on television, etc.

Regulation 767/2009 on the placing on the market and use of feed sets out the basic rules for the way this information must be provided. In addition, advertising of pet food products is also governed, like other consumer products, by the EU's general advertising rules under Directives 2006/114EC and 89/552/EEC

Common principles set out in the above EU legislation are that information communicated about products, including advertising, must be truthful, objective and quantifiable and that it must not mislead or deceive purchasers.

Pet food manufacturers have in many cases drawn up and followed internal company guidelines in respect of their communications activities. Several national pet food associations have also provided guidance to members on labelling and communication. However, in light of the ever greater harmonisation of the European market place, FEDIAF believes that it may be useful to have a European level code for pet food operators on the basis of current EU legislation and industry practice in respect of the provision of information to purchasers relating to pet food products and their characteristics.

This Code addresses the three basic functions of product communication:

- Consumer information on product use
- Control and enforcement
- Marketing and retail

This document is intended to provide practical guidance and should be read in conjunction with the relevant EU and national legislation.

FEDIAF also wishes to emphasise that it is the responsibility of the individual feed business operator or person responsible for placing the product on the market to be able to underwrite and substantiate, prior to use, all claims, declarations and graphics he may use.

This Code will be reviewed and updated at least once a year or more often when the need arises or at the request of a member.

2. GLOSSARY

For the purpose of this Code, the following definitions shall apply, followed by the source.

The sources of the definitions employed are, by order of importance:

- (i) EU legislation;
- (ii) Codex Alimentarius;
- (iii) ISO; and
- (iv) Others as specified. Whenever appropriate, definitions are adapted to *pet* food.

Animal by-products (for pet food production)	Entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen.	R. 1069/2009, Art. 3. 1
Batch or lot	Identifiable quantity of feed determined to have common characteristics, such as origin, variety, type of packing, packer, consignor or labelling; and in case of a production process a unit of production from a single plant using uniform production parameters or a number of such units, when produced in continuous order and stored together.	R. 767/2009, Art. 3.2 (r)
“Bloggo”	A hypothetical pet food brand name	
Carrier	Substance used to dissolve, dilute, disperse or otherwise physically modify a feed additive in order to facilitate its handling, application or use without altering its technological function and without exerting any technological effect themselves	R. 767/2009, Art. 3.2 (m)
Claim	Any labelling or presentation which draws particular attention to the presence or the absence of a substance in the feed, to a specific nutritional characteristic or process or to a specific function related to any of these.	R. 767/2009, Art. 13
Comparative advertising	Any advertising which explicitly or by implication identifies a competitor or goods or services offered by a competitor.	D. 2006/114, Art. 2c
Competent authority	The authority of a Member State or of a third country designated to carry out official controls.	R. 183/2005, Art. 3.e
Complete feed	Compound feed which, by reason of its composition, is sufficient for a daily ration.	R. 767/2009, Art. 3.2 (i)
Complementary feed	Compound feed which has a high content of certain substances but which, by reason of its composition, is sufficient for a daily ration only if used in combination with other feed.	R. 767/2009, Art. 3.2 (j)
Compound feed	Mixture of at least two feed materials, whether or not containing feed additives, for oral animal feeding in the form of complete or complementary feed.	R. 767/2009, Art. 3.2 (h)
Consumer	Persons and families purchasing and receiving food in order to meet their [pets’ needs and/or] personal preference. Note: in this Code, “consumer” is replaced by “purchaser”.	CODEX STAN 1-1985 (REV. 1-1991)
Contaminated material	Feed containing a level of undesirable substances in excess of that tolerated under Directive 2002/32/EC.	R. 767/2009, Art. 3.2 (p)
Customer	One who buys goods or services, e.g. the trade partner. An organization or person who receives pet food.	ISO 9000
Daily ration	The average total quantity of a specific pet food that is needed daily by an animal of a given species, age category and life style or activity to satisfy all its energy and nutrient requirements.	Adapted to pet food from R. 1831/2003, Art. 2 (2) (f)
Dog chews	products for pet animals to chew, produced from untanned hides and skins of ungulates or from other material of animal origin.	R. 142/2011, Annex I (17)

Dry pet food	Pet food with a moisture content of 14 % or less.	Longstanding industry definition
Feed	Any substance or product, including additives, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals.	R. 178/2002, Art. 3.4
Feed additives	Substances, micro-organisms or preparations, other than feed material and premixtures, which are intentionally added to feed or water in order to perform, in particular, one or more of the functions mentioned in Article 5(3): <ul style="list-style-type: none"> - favourably affect characteristics of feed; - favourably affect characteristics of animal products; - favourably affect the colour of ornamental fish and birds; - satisfy the nutritional needs of animals; - favourably affect the environmental consequences of animal production; - favourably affect animal production, performance or welfare, particularly by affecting the gastro-intestinal flora or digestibility of feedingstuffs; - have a coccidiostatic or histomonostatic effect. 	R. 1831/2003, Art. 2 (2)(a)
Feed business	Any undertaking whether for profit or not and whether public or private, carrying out any operation of production, manufacture, processing, storage, transport or distribution of feed including any producer producing, processing or storing feed for feeding to animals on his own holding.	R. 178/2002, Art. 3.5
Feed business operator	Natural or legal person responsible for ensuring that the requirements of the present Regulation are met within the feed business under their control.	R. 767/2009, Art. 3.2 (a)
Feed hygiene	Measures and conditions necessary to control pet food safety hazards and to ensure fitness for animal consumption of a feed, taking into account its intended use.	R. 183/2005, Art. 3 (a)
Feed materials	Products of vegetable or animal origin, whose principal objective is to meet animals nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives, which are intended for use in oral animal feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixtures.	R. 767/2009, Art. 3.2 (g)
Feed intended for particular nutritional purposes "PARNUTs" or "dietetic" pet food	Feed which can satisfy a particular nutritional purpose by virtue of its particular composition or method of manufacture, which clearly distinguish it from ordinary feed. Feed intended for particular nutritional purposes does not include medicated feedingstuffs in the meaning of Directive 90/167/EEC.	R. 767/2009, Art. 3.2 (n)
Finished product	Product that will undergo no further processing or transformation by the organisation.	EN ISO 22000:2005(E)
GMO	An organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination. Organisms obtained through the techniques of genetic modification listed in Annex I B to Directive 2001/18/EC are excluded from the scope of definition.	D. 2001/18, Art. 2 (2) R. 1829/2003
Genetically modified feed (pet food)	Feed containing, consisting of or produced from GMOs. For pet food products which are not required to be labelled "contains GMO" or "produced from GMO", the operator is required to ensure that the pet	R. 1829/2003

	food product does not contain, consist of or is produced from GMO in excess of 0.9% per incorporated [ingredient] component provided that this presence is adventitious (accidental, non-intentional) or technically unavoidable.	
Hermetically sealed container	A container that is designed and intended to be secure against the entry of micro-organisms, such as can, tray, tetra-pack, pouch etc.	R. 142/2011, Annex I (51)
Label	Any tag, brand, mark, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed, impressed on, or attached to a package or container of feed.	R. 767/2009, Art. 3.2 (t)
Labelling	Attribution of any words, particulars, trade marks, brand name, pictorial matter or symbol to a feed by placing this information on any medium like packaging, container, notice, label, document, ring, collar or the internet referring to or accompanying such feed, including for advertising purposes	R. 767/2009, Art. 3.2 (s)
Lot	See "batch" above	R. 767/2009, Art. 3.2 (r)
Major component	A major component means a feed material which provides nutritional value or provides essential characteristics of the pet food product and which can be incorporated in the recipe in amounts defined in this annex without compromising the nutritional balance of the pet food product. Examples: liver, chicken, beef, flour	Longstanding industry definition
Medicated feed	Any mixture of a veterinary medicinal product or products and feed or feeds which is ready prepared for marketing and intended to be fed to animals without further processing, because of its curative or preventive properties or other properties administered with a view either to restoring, correcting or modifying physiological functions by exerting a pharmacological, immunological or metabolic action, or to making a <u>medical diagnosis</u> . Any feed which contains veterinary drugs as defined in the Codex Alimentarius Commission Procedural Manual.	D. 2001/82, Art. 1(6) and (2) Codex (CPGAF)
Milk replacer	Compound feed administered in dry form or after dilution in a given quantity of liquid for feeding young animals as a complement to, or substitute for, post-colostral milk or for feeding young animals such as calves, lambs or kids intended for slaughter.	R. 767/2009, Art. 3.2 (l)
Mineral feed	Complementary feed containing at least 40% crude ash.	R. 767/2009, Art. 3.2 (k)
Minimum storage life	Period during which, under proper storage conditions, the person responsible for the labelling guarantees that the feed retains its declared properties; only one minimum storage life may be indicated in respect of the feed as a whole and is determined on the basis of the minimum storage life of each of its components.	R. 767/2009, Art. 3.2 (q)
Minor component	A minor component means a feed material which is only added in small amounts that contribute either to the nutritional value or the appearance or palatability of the pet food product. Examples: herbs and spices, spirulina	Longstanding industry definition
Mixing bowl principle	Feed materials declaration is based on the weight/percentage at the time of their use in the preparation of the pet food.	Adapted from D. 2000/13, Art. 6 (5)
Moist/wet pet food	Pet food with a moisture content of 60 % or more.	Longstanding industry definition
Multipack	A group of individual units which are not intended to be sold individually.	Adapted from R. 767/2009, Art. 21 (7)

Non-food producing animals	Any animal that is fed, bred or kept but not used for human consumption such as fur animals, pets and animals kept in laboratories, zoos or circuses.	R. 767/2009, Art. 3.2 (d)
Nutrition claim	Any claim which states, suggests or implies that a feed has particular beneficial nutritional properties due to: (a) the energy (calorific value) it i. provides at a reduced or increased rate, or ii. does not provide, and/or (b) the nutrients or other substances it i. contains, ii. contains in reduced or increased proportions or iii. does not contain	R. 767/2009, adapted from Art. 13
Off-pack communication	All representations including text, sound and visual material such as notice, document, leaflets, internet, advertising, point of sale material, promotional material etc.	Adapted from R. 767/2009, Art 3 (2) (s)
Oral feeding of animals	The introduction of feedingstuffs into an animal's gastrointestinal tract through the mouth with the aim of meeting the animal's nutritional needs and/or maintaining the productivity of normally healthy animals.	R. 767/2009, Art. 3.2 (b)
PARNUT	See under "Feed for Particular Nutritional Purposes"	R. 767/2009, Art. 3.2 (n)
Pet or pet animal	Non-food producing animal belonging to species fed, bred or kept, but normally not consumed by humans in the Community. <u>Note:</u> Without being exhaustive, and taking into account cultural habits, the following are considered pet animals in the meaning of the above legal definition: Cats, dogs, ferrets, ornamental fish, amphibians, reptiles, ornamental birds, rodents, domestic rabbits, invertebrates	R. 767/2009, Art. 3.2 (f) Adapted from R. 998/2003, Annex I
Pet food	Any product intended for oral feeding to pet animals whether processed, partially processed or unprocessed, including dog chews, feed materials and compound feed	Adapted from R 178/2002, Art 3 (4)
Pet food chain	Sequence of the stages and operations involved in the processing, distribution, and handling of a pet food and its feed materials/additives, from production to consumption	EN ISO 22000:2005(E)
Pet food safety	Assurance that (pet) food will not cause harm to the animal, human or environment when it is prepared and/or eaten according to its intended use.	EN ISO 22000:2005(E)
Placing on the market	The holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves.	R. 178/2002, Art. 3.8
Premixtures	Means mixtures of feed additives or mixtures of one or more feed additives with feed materials or water used as carriers, not intended for direct feeding to animals.	R. 1831/2003, Art. 2 (2)(e)

Pre-packaged pet food	Any single item for presentation as such to the purchaser consisting of a pet food and the packaging into which it was put before being offered for sale, whether such packaging encloses the pet food completely or only partially, but in any case in such a way that the contents cannot be altered without opening or changing the packaging.	Adapted from D. 2000/13, Art. 1(3)(b)
Presentation	The shape, appearance or packaging and the packaging materials used for the feed, further to the way in which it is arranged and the setting in which it is displayed.	R. 767/2009, Art. 3.2(u)
Processing aids	Means any substance not consumed as a food or feed component by itself, intentionally used in the processing of raw materials, food or their ingredients/components, to fulfil a certain technological purpose during treatment or processing and which may result in the unintentional but technically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the finished product.	R. 1831/2003, Art. 2(2)(h)
Raw pet food	Means pet food which has not undergone any preserving process other than chilling or freezing.	R. 142/2011, Annex I (21)
Semi-moist pet food	Pet food with a moisture content of 14 % or more and less than 60 %.	Longstanding industry definition
Shelf-life	The period during which the product maintains its microbiological safety and sensory qualities at specific storage conditions. It is based on identified hazards for the product, heat or other preservation treatments, packaging method and other hurdles or inhibiting factors that may be used.	Adapted from Codex alimentarius hygienic practices for refrigerated foods with extended shelf-life CAC/RCP 46-(1999)
Statutory information	The placement of mandatory labelling particulars in a prominent place on the packaging in its entirety,(or sign-posted as applicable) easily identifiable and not obscured by any other information	R. 767/2009, Art. 14
Traceability	Means the ability to trace and follow a food, feed, food-producing animal or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing and distribution. Traceability means the ability to trace GMOs and products produced from GMOs at all stages of their placing on the market through the production and distribution chains.	R. 178/2002, Art. 3 (15) R. 1830/2003
Undesirable substance	Substance or product, with the exception of pathogenic agents, which is present in and/or on the product intended for animal feed and which presents a potential danger to animal or human health or to the environment or could adversely affect livestock production.	D. 2002/32, Art. 2(l)

3. INFORMATION ON PACK

GENERAL REQUIREMENTS	LEGAL AND USEFUL DOCUMENTATION
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3.1 PURPOSE AND GENERAL PRINCIPLES OF A LABEL

The label is the medium upfront for communication with the purchaser, trade partners and the enforcement authorities.

3.1.1 Purpose of a label for the purchaser

<p>The prime purpose of a label is to facilitate the buying act of the purchaser by delivering clear, concise, accurate, true and honest information on the composition, characteristics and use of the product.</p>	
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3.1.2 General principles of a label

<ul style="list-style-type: none"> + The product label shall conform to all appropriate legislation. + The language used for labelling shall be in at least the language or one of the official languages of the Member State or region in which it is placed on the market. Note: even if the Regulations permits only one official language to be labelled, it is recommended to check locally, e.g. for Belgium to label both in Dutch and French + The vocabulary used should be easily understandable by the average purchaser. + Information will be written and/or represented (pictorials/icons...) in a clear, visible, legible, unambiguous way in terms which are easily understood by the purchaser and further information and explanation should be readily available to purchasers on request. + Pet food shall not be described or presented on any label with words, pictorial or other devices that are false or untruthful. + Pet food labels shall not mislead, confuse, exaggerate or deceive either directly or indirectly or by implication. + The label shall clearly indicate that it is intended for pets. + Labelling must also provide the purchaser with directions on the proper use of the product. + Feeding instructions as well as the storage conditions if relevant, must describe the way in which the pet food should be kept and used. 	<p>R. 767/2009, Art. 14.1</p>
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3.2 LEGAL REQUIREMENTS

3.2.1 Mandatory labelling requirements

The mandatory labelling particulars shall be given in their entirety in a prominent place, easily identifiable and not be obscured by any other information. They shall be displayed in a colour, font and size that does not obscure or emphasize any part of the information, unless such variation is to draw attention to precautionary statements (R. 767/2009, Art. 14.1 & 2)

3.2.1.1 Product description

The description of the type of feed: "feed material", "complete feed" or "complementary feed", as appropriate:
 + for "complete feed" the designation "complete milk replacer feed" may be used,
 + for "complementary feed" the following designations may be used: "mineral feed", "or 'complementary milk replacer feed";
 + for pets other than cats and dogs "complete feed" or "complementary feed" may be replaced by "compound feed"; (R. 767/2009, Art. 15 a)

Synonymic expressions in certain languages:

- (a) For feed material(s)
- in German the designation "Einzelfuttermittel" may be replaced by "Futtermittel-Ausgangserzeugnis",
 - in Greek "πρώτη ύλη ζωοτροφών" may be replaced by "απλή ζωοτροφή",
 - in Italian "materie prime per mangimi" may be replaced by "mangime semplice";
 - in Czech the designation "krmiva" may be replaced by "produkty ke krmení" as applicable
- (b) For feed for pets, the following expressions shall be allowed:
- in Dutch "samengesteld voeder";
 - in English "pet food";
 - in Hungarian "állateledel";
 - in Italian "alimento";
 - in Polish "karma";
 - in Slovenian "hrane za hišne živali";
 - in Spanish "alimento",
 - in Finnish "lemmikieläinten ruoka",
 - in Czech the designation "kompletní krmná směs" may be replaced by "kompletní krmivo" and "doplňková krmná směs" may be replaced by "doplňkové krmivo";
 - in Bulgarian "храна".

R. 767/2009, Annex II Point 3 a) & b)

NOTE: Manufacturers of pet food without components of animal origin who also process animal proteins on the same manufacturing site must clearly label the product as a pet food to comply with the Transmissible Spongiform Encephalopathies Regulation. Additionally, raw pet food must be labelled "pet food only".

R. 999/2001 Annex IV, III D
 R. 142/2001 Annex VIII, Sect. 4, Chapter II,

3.2.1.2 Animal species

The species or category of animal for which the product is intended

Examples: + Bloggo compound pet food for domestic rabbits
 + Bloggo complete feed for adult dogs
 + Bloggo complete pet food for dogs

R. 767/2009, Art. 17.1(a)

3.2.1.3 Instructions for proper use

Instructions for the proper use of the feed indicating the purpose for which the feed is intended.	
<p>✦ The proper use may also require manufacturers to indicate the necessity to ensure fresh water is available at all times when feeding dry food.</p> <p>✦ It is advisable to provide recommended storage conditions, particularly for dry and semi-moist pet food products since climatic conditions may degrade the product quality.</p> <p style="padding-left: 40px;">Examples: + in the case of wet pet food serve 400 g per day for average adult cat of 4 kg, serve at room temperature, refrigerate unused amount + to be fed in two meals</p> <p>✦ The instructions for proper use should indicate how to provide a daily ration in terms of amounts required to be fed relative to the life stage, the life style and the size of the pet.</p> <p>✦ For pet food other than cat and dog food not labelled "complete" or "complementary" in accordance with Art. 15 (a) of Regulation 767/2009, the feeding instructions shall be adapted to the pet species for which the pet food is intended. The instructions of proper use of complementary feed and feed materials containing additives in excess of the maximum levels fixed for complete feed shall state the maximum quantity</p> <ul style="list-style-type: none">- in grams or kilograms or units of volume of complementary feed and feed materials per animal per day or- percentage of daily ration or- per kilo of complete feed or percentage in complete feed <p>In order to ensure that respective maximum contents of feed additives in the daily ration are complied with, it may be appropriate to adjust the daily ration accordingly.</p>	<p>R. 767/2009, Art. 17.1(b)</p> <p>R. 767/2009, Annex II 4.</p>

3.2.1.4 Feed material declaration

For compound feed for pet animals, the feed materials must be listed by specific name or category (as per D. 82/475) in descending order by weight, specific amounts in % may be indicated.	
<p>The heading "Composition" shall appear before the list of feed materials and categories</p> <p>By specific names Feed materials shall be listed indicating the name of each feed material in descending order by weight (mixing bowl principle); that list may include the percentage of weight. However, when feed materials are used in concentrated or dehydrated form and are reconstituted at the time of manufacture they shall all be listed in order of weight as recorded before their concentration or dehydration. The feed material incorporated in a dehydrated form must be stated; the terms "dried", "powder", "meal" or similar terms are permitted when it clearly indicates that the component was dehydrated e.g. the description used should give a clear indication as to the process/state of the dehydrated material.</p> <p>Examples:</p> <ul style="list-style-type: none">• Tomato powder• Dried apple flakes• Carrots (from dried carrots)• Dried chicken• please see Annex V for further examples and explanations	<p>R. 767/2009, Art 17.1(e)</p> <p>R. 767/2009, Art.17.1(e) R. 767/2009, Art. 16.1(a) & Art. 24.5 D. 2000/13, Art. 6 (5)</p> <p>R. 767/2009, Art. 24.5</p>

<p>The name of a feed material listed in the Catalogue of feed materials (R. 575/2011) may only be used on condition that all relevant provisions of the Catalogue are complied with, i.e. the feed material must</p> <ul style="list-style-type: none"> • comply with the description/specifications in the Catalogue • respect the production process if included in the feed material's name in accordance with the Catalogue's glossary • if appropriate add a qualifier (e.g. hydrolysed chicken protein) <p>The name/labelling and the presentation of the feed shall not mislead the purchaser as to the compliance of the labelling with the Community catalogue</p> <p>By categories The specific names of the feed materials may be replaced with the name of the category to which the feed material belongs, with reference to the established categories grouping several feed materials. Example: meat and animal derivatives</p> <p><u>See Annex 1 : The categories of feed materials</u></p> <p>Declaration Use of one of these two forms of declaration shall exclude use of the other except</p> <ul style="list-style-type: none"> • where particular attention is drawn to particular feed materials or • where a feed material does not belong to any of the categories which have been defined; <p>in that case, the feed material for pet food designated by its specific name, shall be mentioned in descending order by weight in relation to the categories. Examples: herbs and the example below ("particular attention")</p> <p>Furthermore, it shall be permitted to label the term "minerals" if feed materials are labelled by specific names.</p> <p>Particular attention The name and percentage of weight of a feed material shall be indicated if its presence is emphasised on the labelling in words, pictures or graphics Example: When "liver" or a variety is emphasised on the label, the following declaration in the composition shall apply: "meat and animal derivatives (liver X%)" or "meat and animal derivatives (beef X%)"</p>	<p>R. 767/2009, Art. 17.2(c)</p> <p>D. 82/475</p>
<p>For feed for pet animals composed of only one feed material (chews, raw pet food...) the feed material must be indicated by its specific name</p>	
<p>The treatment may be included. Examples: Feed material: Pig ears Feed material: Dried pork hide Feed material: Beef livers (frozen)</p> <p>The analytical constituents must at least be labelled according to annex V of Regulation 767/2009, or in accordance with Annex VII, Chapter II, or in accordance with the particulars laid down in the Catalogue of Feed Materials. Where additives are included, it is recommended to apply the labelling rules for compound pet food.</p>	<p>R. 767/2009, Art 15, 16</p>

3.2.1.5 Additives

Additives with a legal maximum have to be declared on pet food labels when they are added. All additives can be declared voluntarily when added.

Additives are allowed to be used only if they are on the EU Register of permitted additives, and may be used only according to the specific categories and functional groups for which they are approved.

R. 1831/2003, Chpt II, Art. 10

A. What has to be declared

1. Mandatory declarations

- Additives where a maximum limit is set for any kind of species. E.g. an additive permitted for use in cat food, with a maximum level for another pet or a food producing animal, but with no maximum limit for cats, has to be labelled ([see Annex 9](#))
- Additives belonging to the categories
 - Zootechnical additives
 - Coccidiostats and histomonostats
- Additives belonging to the functional groups
 - Urea and its derivatives
- Any other additive if its presence is emphasized on the label whether in words, pictures or graphics,
- It may happen that some vitamins are declared with a value higher than the legal maximum laid down in the relevant text, when processing losses require higher levels to be added in order that nutritional standards are maintained; in this case, manufacturers must be able to substantiate that the finished product complies with the legal maximum when put on the market. [See Annex 9](#)

R. 767/2009, Annex VII.I.1(a)

Annex VII.I.1(b)

Annex VII.I.1(c)

Annex VII.I.3

2. Voluntary declarations

- All other additives

R. 767/2009, Art. 15 (f)
Annex VII. I. 1

B. How additives have to be declared

1. Mandatory declarations

Additives shall always be declared within the statutory section.

The heading "Additives" shall appear before the list of feed additives.

- The functional group or the category, for example: "vitamins" or "nutritional additives" ([see Annex 10 for categories and functional groups](#))
- The specific name as defined in the relevant legal act authorising the additive and/or identification number
- The added amount of the compound

Examples: "trace elements" or "nutritional additives" followed by one of the following options:

- ~ zinc sulphate heptahydrate 500mg/kg
- ~ E6/Zinc, 500 mg/kg,
- ~ E6, 500 mg/kg,
- ~ Copper chelate of hydroxy analogue of methionine, 30 mg/kg
- ~ 3b4.10, 30mg/kg

R. 767/2009, Annex VII.I.1

Note: The identification numbers of feed additives are changing format, e.g. "E4" covering compounds of copper will and have partially changed

[European Union Register of](#)

<p>to e.g. "3b4.10" for Copper chelate of hydroxy analogue of methionine. Whilst E-numbers still exist, they will be gradually phased out and to avoid unnecessary label changes manufacturers may consider labelling the name of the additives if the new identification number is not yet available; the European Union Register of Feed Additives should be consulted for the relevant identification number.</p> <p>Different languages can be combined (see example Annex 9)</p> <p>Vitamin declaration can be applied using the term "Vitamin" and the amount added can be in international units (IU/kg) or by weight (mg/kg) as appropriate</p> <p><u><i>Derogation</i></u></p> <ul style="list-style-type: none"> • For pet food, additives of the functional groups "preservatives, antioxidants and colorants" with a maximum legal level only the respective functional group may be indicated • In this case, names, the identification number and the functional group of the feed additive not declared shall be disclosed by the person responsible for the labelling to the purchaser on his request (see section on information of the purchaser on composition 3.2.1.19) <p>2. Voluntary Declarations</p> <ul style="list-style-type: none"> • If an additive is declared on the label voluntarily without particular emphasis (claim) the following should be declared: <ul style="list-style-type: none"> ~ The functional group or the category, ~ The specific name and/or identification number ~ The added amount • Additives belonging to the functional groups of amino acids, vitamins and trace elements can also be declared under the heading "analytical constituents" with the following details: <ul style="list-style-type: none"> ~ Specific name as defined in the relevant legislation ~ The total amount <p>Remarks: If an additive belongs to more than one of the functional groups the functional group or category appropriate to its principle function shall be indicated</p> <p>Where an additive with a legal maximum is declared both under additives and analytical constituents, it is likely that two different values will be declared – the added value in the list of additives and the total value under analytical constituents.</p> <p>C. Specificities for Complementary Feed</p> <ul style="list-style-type: none"> • In complementary feed, additives can be incorporated at higher levels than in complete feed, i.e. up to: 100 times the relevant fixed maximum content in complete feed If the level of at least one additive in the complementary feed exceeds the maximum permitted level for complete feed the maximum intake level of the complementary feed has to be indicated The instructions for proper use of complementary feed should ensure that respective maximum contents of feed additives in the daily ration are complied with. 	<p>Feed Additives</p> <p>R. 26/2011, Annex</p> <p>Annex VII.I.5</p> <p>Annex VII.II.5</p> <p>Annex VII.I.6</p> <p>Annex VII.7</p> <p>R. 767/2009, Art. 8 and annex II, point 4</p>
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<ul style="list-style-type: none"> • If the complementary pet food has a content of additives exceeding the level of 100 times the maximum limit for complete feed, the product has to be approved as a PARNUT. The factor of 100 referred may only be exceeded if the composition of such products meets the particular nutritional purpose in respect of the relevant intended use according to Article 10 of Regulation 767/2009/EC. The conditions of use for such feed shall be further specified in the list of intended uses. If the producer of such feed uses feed additives referred to in Chapter 2 of Annex IV to Regulation (EC) 183/2005, he has to be approved according to Article 10 of that Regulation. • If not approved as a PARNUT, the product may only be marketed as a premixture, not as a complementary pet food. <p>See Annex 9</p>	<p>Fediaf Nutritional Guidelines, page 31</p>
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3.2.1.6 Analytical constituents

The mandatory declaration of analytical constituents is related to the type of feed and/or the target animal species.				
<p>The heading “Analytical constituents” shall appear before the list of the analytical constituents</p> <p>Moisture content must be stated if it exceeds:</p> <ul style="list-style-type: none"> ✦ 7 % in case of milk replacer feeds and other compound feed with a milk product content exceeding 40 %, ✦ 5 % in the case of mineral feed containing no organic substances, ✦ 10 % in the case of mineral feed containing organic substances, ✦ 14 % in the case of other feed. <p>Providing that no other level is laid down in Annex IV (feed materials) or the Catalogue</p> <p>The declaration is optional if the moisture content of the compound feed does not exceed the limits stated in the paragraphs above.</p> <p>Ash insoluble in hydrochloric acid must be labelled when exceeding 2.2% of dry matter.</p> <p>Other Analytical constituents:</p> <table border="0" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;">Type of Feed</td> </tr> <tr> <td style="text-align: center;">Analytical constituents and levels</td> </tr> <tr> <td style="text-align: center;">Target species</td> </tr> </table> <p>Complete feed - Crude Protein or Protein</p> <ul style="list-style-type: none"> - Crude fibres - Crude oils and fats or Fat content - Crude ash or Incinerated residue or Inorganic matter <p style="text-align: center;">Cats, dogs Cats, dogs Cats, dogs</p> <p>Cats, dogs</p> <p>Complementary feed – Mineral - Calcium</p> <ul style="list-style-type: none"> - Sodium - Phosphorus <p style="text-align: center;">All species</p>	Type of Feed	Analytical constituents and levels	Target species	<p>R. 767/2009, Annex VII.II</p> <p>R. 767/2009, Art. 15 (g) & Annex I point 6</p> <p>R. 767/2009, Art. 15 (g) & Annex I point 5</p> <p>R. 767/2009, Annex VII.II.1</p>
Type of Feed				
Analytical constituents and levels				
Target species				

All species All species	
<p>Complementary feed – Other- Crude Protein or Protein</p> <ul style="list-style-type: none"> - Crude fibres - Crude oils and fats or Fat content - Crude ash or Incinerated residue or Inorganic matter <p style="text-align: center;">Cats, dogs Cats, dogs Cats, dogs</p> <p>Cats, dogs</p> <p>For other pet animals such as pet rabbits, ornamental birds etc. analytical constituents may be labelled voluntarily</p> <p>N.B. If the protein value is indicated, this indication shall be done according to the EU method, if available or to the respective official national method in the Member State where the feed is placed on the market.</p> <p>Additives belonging to the functional groups of amino acids, vitamins and trace elements and other nutrients can also be declared under the heading “analytical constituents” with the following details:</p> <ul style="list-style-type: none"> - Specific name as defined in the relevant legislation - The total amount, <p>N.B. The previous “guarantee statement” is no longer a legal requirement. However, manufacturers should take into account the legal tolerances and any losses during production and storage</p>	<p>R. 767/2009, Annex VII.II.3</p> <p>R. 767/2009, Annex VII.II.2</p>

3.2.1.7 Tolerances

Tolerances are permitted for discrepancies between the labelled analytical values of a feed material or compound feed and the values analysed in official controls following Art 11 par. 5 (and Annex IV) of the R. 767/2009 regulation.	
<ul style="list-style-type: none"> • The tolerances laid down in the annex 2 of this Code include technical and analytical deviations <ul style="list-style-type: none"> - Unavoidable variations - from batch to batch <li style="padding-left: 20px;">- in the raw materials <li style="padding-left: 20px;">- in the production processes - Inherent variability in intra-inter laboratory analysis <ul style="list-style-type: none"> • Where the composition (analytical values) is found to depart from the labelled composition, the tolerances laid down in Annex 2 of this Code are permitted. <p>Tolerances are not intended to allow real deficiencies or excesses of the guaranteed compound. See Annex 2</p>	<p>R. 767/2009, Art. 11.5 & Annex IV</p>

3.2.1.8 Energy and protein declaration

The energy and protein values may be declared	
<p>If the energy value and/or protein value are indicated, this indication shall be done according to the EC-method, if available or to the respective official national</p>	<p>R. 767/2009, Annex VII.II.3</p>

method in the Member State where the feed is placed on the market, if available.
The methods of calculation contained in the FEDIAF Nutritional Guidelines for
Cats and Dogs are recommended.

[FEDIAF Nutritional
Guidelines Cats and Dogs](#)

3.2.1.9 Business address

The name or business name and the address of the feed business operator responsible for the labelling must be printed on pack - R. 767/2009, Art. 15 (b)

Labelling the country of production is voluntary.
 For third country imports, it is advised to have a reference to the country of production.
 For exports to third countries, the requirements of the third countries must be followed.
 "Produced in the EU" is acceptable for all EU Member States; this formulation is also accepted for products imported into Switzerland
 "Produced in the European Economic Area" is acceptable for member countries of the EEA, like Norway or Liechtenstein
Examples: Produced in Morocco, Produced in the EU
 registration number if country abbreviated

3.2.1.10 Traceability tools

For traceability purposes, the batch number and the approval number allocated to the producing establishment must be printed on pack in addition to the business address as mentioned under 3.2.1.9

1. Batch number or lot reference number

The batch number can be numeric or alphanumeric.
 A batch is defined as a unit of production produced in a single plant using uniform production parameters – or a number of such units, when produced in continuous order and stored together – and that can be identified for the purposes of recall and re-treatment or disposal should tests show that to be necessary. However the batch cannot exceed one day's (24 hours) production.
 The batch number does not need to appear in the space reserved for the labelling particulars, but an indication must be given where it can be found (*signposting*)

Example: for batch number: see top of the can

2. Approval number

- a. The required approval number of the production plant refers to the regulation 1069/2009/EC or to 183/2005 when available.
 If a person responsible for the labelling has several approval numbers he shall use the one obtained under Regulation 183/2005/EC.
 If there is no number obtained in the relevant articles of the above-mentioned regulation(s), companies may use on a voluntary basis a number obtained in accordance with national practice or in accordance with Article 24 of Regulation 1069/2009.
 In all cases it is advised to add the abbreviations for the producing country (e.g. NL for the Netherlands) as a prefix to the approval number.
- b. When the person responsible for labelling is NOT the producer
- i. the name or business name and address of the producer must be labelled OR
 - ii. the approval number of the producer as referred to under 1. If no number is available an identifying number attributed on the producers' or on the importing feed business operators' request will be provided by the competent authority

Fedial Code of practice for the manufacture of safe pet food – chpt IV.3
 R. 767/2009, Art. 15 (d)

R. 1069/2009, Art. 24

R. 767/2009, Art. 15 (c) & Art. 17.1(c)

R. 1069/2009, Art. 24

R. 183/2005, Annex V Chpt 2

c. The **Establishment Approval Number** may be marked outside the space reserved for the labelling particulars: in this case the relevant expression shall be accompanied by an indication of where the information appears

Example: For approval number: see top of the can.

If no approval or registration number has been assigned to a production plant, the name and the production address of the plant shall be indicated.

3.2.1.11 Net quantities

The net weight or volume expressed in units of mass in the case of solid products, and in units of mass or volume in the case of liquid products. R. 767/2009, Art. 15 (e)

The expressions "net weight" or "net volume" before the numeric indications are not compulsory.

Example: 420 g or net weight: 420 g.

The character dimension in accordance with weights and net volumes must be as follows:

- 6 mm if the net quantity is greater than 1000 g or 1000 ml
- 4 mm if it is between 1000 g or 1000 ml and 200 g or 200 ml excluded;
- 3 mm if it is between 200 g or 200 ml and 50 g or 50 ml excluded;
- 2 mm if it is equal to or less than 50 g or 50 ml.

The net quantity may be marked outside the space reserved for the labelling particulars: in this case the relevant expression shall be accompanied by an indication of where the information appears. See section 3.2.2.1 of this Code on the EC "e" mark.

The indication of the net weight for pet food products normally sold by units shall not be required if it is common trade practice; in this case the number of units must be labelled.

Example: 5 pig ears

D. 76/211, Annex 3.1

R. 767/2009, Art. 21. 2

D. 76/211, Art 4.2

<p><i>Tolerances</i></p> <p>Tolerances have been established under which there is no obligation to indicate the presence of GMOs on the labels.</p> <p>Nevertheless this is only possible provided that the presence is adventitious or technically unavoidable and the operators must be in a position to supply evidence to satisfy the competent authorities that they have taken appropriate steps to avoid the presence of such materials.</p> <p>The tolerances that should be applied to each single feed material are the following: No higher than 0.9 % for the GMOs authorized in the EU</p> <p>N.B. Claims such as “free from GMOs” shall not be made (see 5.2.2.4) See Annex 3</p>	
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3.2.1.14 Feed for Particular Nutritional Purpose/PARNUTs/Dietetic pet food

<p>For dietetic pet food the following additional indications must appear in the legal space on the packaging, on the container or on the label of the feed.</p>	
<p>a) the qualifying expression “dietetic” together with the description of the feed;</p> <p>b) the precise use, i.e. the particular nutritional purpose (or PARNUT)</p> <p>c) the indication of the essential characteristics of the feed; when the particular nutritional purpose can be achieved by several nutritional characteristics foreseen in part B column 2 of Directive 2008/38, one or all of the listed nutritional characteristics can be indicated</p> <p>d) the declarations prescribed in column 4 in the annex concerning the PARNUT by indicating the precise term of the component; in case of authorised additives which must be labelled as total amount under analytical constituents, either the amount present naturally if not added, or the amount added plus the amount present naturally.</p> <p>e) If a component is required to be labelled “if added” in column 4 in the annex Part B concerning the PARNUT it must be labelled when added for achieving the PARNUT</p> <p>f) Analytical constituents required in column 4 in the annex Part B concerning the PARNUT must be quantitative</p> <p>g) the recommended length of time for use of the feed, either the range or the precise time. In the case of complementary feedingstuffs intended for particular nutritional purposes guidance on the balance of the daily ration must be provided in the instructions for use contained on the label.</p> <p><u>Moreover:</u></p> <ul style="list-style-type: none"> - the label or the directions for use of the feed for particular nutritional purposes must bear the indication “It is recommended that a veterinarian’s opinion be sought before use”, complemented by “or before extending the period of use” as appropriate. It may, however, be provided in the list of intended uses in the Annex that this declaration may be omitted; - the labelling of the feed for particular nutritional purposes may also highlight the presence or the low level of one or more analytical constituents which are essential for the description of the feed. In such cases, the minimum or maximum level of the analytical constituents expressed as percentage weight of the feed must be clearly indicated in the list of declared analytical constituents; <p style="margin-left: 40px;">Examples: + sodium: 0.5% + for support of liver function in case of chronic liver insufficiency</p> - the qualifying expression “dietetic” shall be reserved solely for feed for particular 	<p>R. 767/2009, Art. 18</p> <p>D. 2008/38 Annex 1 Parts A and B</p> <p>D. 2008/38</p>

<p>nutritional purposes. Qualifying expressions other than "dietetic" shall be prohibited in the labelling and presentation of these feeds;</p> <p>- notwithstanding the provisions of Article 17.4 (R. 767/2009), the declaration of feed materials may be made in the form of categories grouping several feed materials, even where the declaration of certain feed materials by their specific name is required to justify the nutritional characteristics of the feed.</p> <p>Examples: + meat and animal derivatives (chicken: source of protein) + for support of liver function in case of chronic liver insufficiency</p>	<p>R. 767/2009, Art. 18 (a)</p>
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3.2.1.15 Organic pet food

<p>Pending the inclusion of detailed processing rules for pet food in Regulations 834/2007 and 889/2008 relating to organic production, national rules or in the absence thereof, private standards accepted or recognised by the Member States shall apply (Art. 95 [5] of R. 889/2008)</p> <p>The rules for using the term "organic" apply to any term suggesting that the pet food is produced from or with organic components (e.g. "bio", "biological", "eco" etc).</p>	
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3.2.1.16 Products sold in multipacks

<p>For the purpose of this Code, multipacks (the combined total quantity of the outer package may not exceed 10 kg) will be handled as a single unit and labelled according to existing rules.</p>	
<p>Nevertheless, the packs contained in the multipack will need to be labelled at least with:</p> <ul style="list-style-type: none"> - The type of feed - The species or category of animal - The batch or lot reference number - The minimum storage life - The net quantity - Storage conditions if specific or appropriate <p>The outer pack shall include all mandatory declarations and should include an indication that the single containers cannot be sold separately.</p>	<p>R. 767/2009, Art. 21.7</p> <p>R. 767/2009, Art. 15 (a) & Art. 7.1(a) Art. 15 (d) & Art. 17.1(d) Art. 15 (e)</p>

3.2.1.17 Free Samples

<p>Legally, the same basic labelling rules apply to samples of pet food products, regardless of the fact that they are being distributed for free as part of a sampling activity, rather than being sold.</p>	
<p>Labelling information</p> <ol style="list-style-type: none"> i. Product samples should therefore be fully labelled (see annex for the standard information to provide and below). ii. In addition, the statement "Free Sample - not for sale" or equivalent should appear prominently to prevent the product being sold. iii. All the information set out above must be provided in the local language(s) understood by the purchasers receiving the samples. It must also be legible and easily visible. 	<p>R. 767/2009, Art. 4.2 (b)</p>
<p>Availability of information</p> <p>If individual products from a multipack product are used as samples, they will not comply with the above requirements since full labelling information is usually located only on the outer pack/bag and not on the individual products. Since purchasers will not receive the outer pack, it will be important to ensure that full</p>	

<p>information is supplied to purchasers by other means.</p> <p>The labelling information can appear either:</p> <ul style="list-style-type: none"> • on the product packaging itself; or • on a label attached to the packaging, or • in some other written form which the purchaser can retain - e.g. a sticker/leaflet. <p>If the information is not provided on-pack, the <u>minimum information</u> on individual products should ideally be :</p> <ul style="list-style-type: none"> - Type of feed and target animal - Best before date - The net quantity - Traceability tools as defined under 3.2.1.10 - Storage conditions if specific or appropriate 	
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3.2.1.18 Chews

<p>Due to their origin and edible nature, these products must be labelled as pet food: either as complementary pet food or as feed materials (when consisting of only one feed material).</p> <p>The labelling must be adequate and appropriate to avoid misleading the purchaser.</p> <p>Feeding instructions need to be adapted to the specific use of this product category.</p> <p>These products are generally used to :</p> <ul style="list-style-type: none"> • entertain the pet Example: + edible product for the pleasure of chewing with no significant caloric contribution • achieve/perform mechanical actions Example: + to clean teeth, to file rodent teeth... • transfer/transmit/... beneficial/useful substances Example: + for fresh breath 	

3.2.1.19 Information for the purchaser on composition

<p>On the label, a free telephone number or other appropriate means of communication shall be indicated in order to allow the purchaser to obtain certain information in addition to the mandatory particulars</p>	
<p>"other appropriate means" than a free telephone number could be for example internet, e-mail address, postal address...</p> <p>This "certain information" relates to</p> <ul style="list-style-type: none"> (a) the name, the identification number and the functional group of the feed additives the labelling of which are not mandatory according to chapter 3.2.1.5 A; this information must also be given on request in the case of preservatives, antioxidants and colours labelled by their functional group only (b) the feed materials incorporated that are designated by category 	<p>R. 767/2009, Art. 19 (a) & (b), Annex VII, Chapter I, no. 2 and 4</p>

3.2.1.20 Legibility

The person responsible for the labelling particulars has to ensure the visibility and legibility of information of the label at the point of sale.

This can be done via appropriate font sizes, type face and/or colour (including background). All labelling details must be readable by the average purchaser.

To improve legibility, any label innovation including but not limited to "peelable/restickable" labels are possible as long as the following information is **visible at first glance**:

- brand
- type of feed
- species or category of animal
- net quantity
- batch n° / best before date
- pictorial indicating to purchasers how to have access to all other mandatory information available when opening the restickable label.

R. 767/2009, Art. 14. 1

See Annex 7

3.2.1.21 Bulk Management

Feed materials or compound feed marketed in bulk or in unsealed packages or containers in accordance with Article 23(2) of R. 767/2009 shall be accompanied by a document containing all mandatory labelling particulars in accordance with this Regulation.

R. 767/2009, Art. 11.2

3.2.1.22 Sales by means of distance communication (INTERNET)

Where feed is offered for sale by means of distance communication as defined in Article 2 of Directive 97/7/EC the mandatory labelling particulars required by this Directive shall appear on the material supporting the distance selling or be provided through other appropriate means prior to the conclusion of a distance contract, except for the particulars provided in Articles 15 (b), (d), (e), and 16 (2) (c) or 17(1)(d) of R. 767/2009.

The exceptions are related to:

- the name or business name and address (Art. 15 (b))
- the batch number (Art. 15 (d))
- the net quantity (Art. 15 (e))
- the minimum storage life for additives or feed (Art. 16 2(c); Art. 17 1 (d)).

Nevertheless these particulars shall be provided at the latest at the time of delivery of the feed.

R. 767/2009, Art. 11.3

3.2.2 Other Legal Options

Other particulars of legal pertinence may be added in the prominent legal space. In these cases they must comply with the relevant legislation.

3.2.2.1 EC mark "e"

The EC mark "e" is voluntary, but using the "e" mark means that the manufacturer has to comply with the conditions laid down in the relevant EU regulation weight and measures.

The EC mark "e" indicates that the product has been packed in compliance with the EC metrological legislative requirements (the producer is responsible for its correct application).

The "e" mark regulation applies to pre-packed packages between 5g and 10 kg. The letter "e" has a well defined shape and minimum dimensions. It must be at least 3 mm high and placed in the same field of vision as the indication of the nominal weight or capacity.

See Annex 8

D. 76/211,
Annex 1 - § 3.3

D. 71/316,
section 3 - Annex II

3.2.2.2 Pet food intended for export to third countries

The labelling provisions laid down in the Regulation do not apply to feed materials and compound feed for exports to third countries with the exception of countries having adopted the European Regulation. Therefore products intended for third countries (with the above exceptions) need to comply with the legislation of the country of destination.

3.2.2.3 Environmental labelling

The person responsible for the labelling particulars must also comply with local mandatory environmental provisions laid down in certain Member States (e.g. green dot).

3.3 VOLUNTARY INFORMATION

The person responsible for the labelling particulars of a feed material or compound feed may provide information in addition to that required under this Regulation.

For voluntary declaration of additives (see section 3.2.1.5).

For other voluntary information such as claims, icons, logos, pictorials, product shots, the following general principles, as laid down point 5.1, must apply.

3.4 EXAMPLE OF A PET FOOD LABEL REVIEW CHECK-LIST

A pet food label review check-list is provided to help the marketer to ensure conformity/compliance of the labels placed on products

This example is only for guidance and is not intended to be complete. In order to correctly complete this check-list, the following documentation is necessary: Product recipe (formula), Analytical results, Markets of destination (EU or 3rd countries) etc....

Note: products intended for third countries (with the exception of countries indicated in 3.2.2.) need to comply with local legislation.

See Annex 4

4. OFF-PACK COMMUNICATION

GENERAL REQUIREMENTS	LEGAL AND USEFUL DOCUMENTATION
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The definition of "labelling" in Article 3.2 (s) of R. 767/2009 includes information on the label ("on-pack") and via any other medium. This chapter refers to any information which is not "on-pack" and for ease of understanding refers to "off-pack communication".

This section of the Code addresses all types of off-pack communication.

No forms of off-pack communication should conflict with the basic principles of responsible pet-ownership.

Off-pack communication may be used not only for product communication but also for other purposes such as to promote the use of prepared pet food, to disseminate information on the importance of nutritional research done and supported by companies and to promote educational material to various target audiences.

Off-pack communication must always be coherent with on-pack communication and vice versa.

As advertising is not harmonised, it is recommended to double-check with national advertising codes and laws where they exist.

4.1 ABOUT THE PRODUCT

4.1.1 Presentation of the product in the off-pack communication

<ul style="list-style-type: none"> ✦ the presentation of pet food should make clear it is intended only for pets and not create confusion with human food, or farm feed ✦ it should be recognised that off-pack communication can impact on the product itself (for example off-pack claims that might be deemed medicinal could result in the products being considered medicinal by presentation by the relevant authorities). 	
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4.1.2 Claims and "labelling particulars" in the off pack communication

<ul style="list-style-type: none"> ✦ Where feed is offered for sale by means of distance communication, the mandatory labelling particulars shall be given <ul style="list-style-type: none"> i. shall be provided at the latest at the time of the delivery of the feed: business name and address, batch or lot number, net quantity, storage life ii. shall appear on the material supporting the distance selling: all other mandatory labelling particulars ✦ Provisions described in sections 5 "claims" of the present Code are applicable both for on-pack and off pack communication, consequently claims presented in off-pack communication must be objective, verifiable and understandable by the user of the feed; the justification or the scientific substantiation shall be available at the time the communication is made. 	R. 767/2009, Art. 11.3 D. 97/7, Art. 2
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4.2 PET WELFARE

All off-pack communication relating to pet welfare should adhere to the following principles

- all pets should be represented in a responsible way, according to national laws and practices (e.g. rules on tail docking, ear cropping) and not showing aggressive behaviour,
- pets should not be shown being fed human food,
- anthropomorphic representations of the pet should be avoided
- pets should be healthy looking animals, well-trained, well-groomed (with the exception of dietetic pet food or other health or welfare communications).

4.3 INVOLVED PERSONS, OWNERS, PROFESSIONALS

All off-pack communication relating to involved persons, owners and professionals should adhere to the following principles

- the communication should only depict persons and/or pets engaged in non-dangerous activities,
- the communication should only show the consumption of products in a safe way,
- the communication should not be disrespectful to pets and people when used; testimonials (e.g. breeders, trade, owners, etc.) must be true and verifiable,
- the veterinary profession should be used only when allowed by national practice (professional codes of ethics).

Note: The European Advertising Standards Alliance provides useful guidance for Member States across the EU: <http://www.easa-alliance.org/Home/page.aspx/81>

4.4 CHILDREN

When children are involved, particular responsibility should be exercised

Examples: + they should be shown in a natural environment,
+ the language used should be understandable and
+ they should be shown in a situation of responsibility (such as helping to look after pets but under adult supervision).

The communication should avoid situations which might create a hygiene risk

Example: + during bathing, eating, pets licking human faces...

The advertising of pet food should contribute to an appropriate behaviour pattern of relationship.

For general guidance on communication and advertising to children, refer to EASA, WFA and Children's Advertising Review Unit ([CARU](#)) and/or national practice, laws and regulations

4.5 SOCIAL RESPONSIBILITY IN COMMUNICATION

All off-pack communication relating to social responsibility should adhere to the following principles

- the content and the execution of the communication should reflect good taste and social responsibility in accordance with each country's culture, for example in the species of animal and materials used,
- the choice of medium should reflect the overall attitude expressed in these guidelines,

<ul style="list-style-type: none">‣ the attitude vis-à-vis competitors and competitors' products should not be inaccurate and/or denigrating,‣ proper nutrition, care and adequate physical activity are integral to maintaining good health of pets, and the communication should not imply otherwise.	D. 2006/114
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5. CLAIMS

GENERAL REQUIREMENTS	LEGAL AND USEFUL DOCUMENTATION
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5.1 SCOPE AND GENERAL PRINCIPLES

Any claims referring to the product must: be substantiated; not confuse or mislead purchasers; not denigrate other pet foods; or suggest that other pet foods do not possess such characteristics when it is not true.

<p>The information shall not mislead the user</p> <p>(a) as to the intended use or characteristics of the feed, in particular, the nature, method of manufacture or production, properties;</p> <p>(b) by attributing to the feed effects or characteristics that it does not possess or by suggesting that it possesses special characteristics when in fact all similar feeds possess such characteristics,</p> <p>(c) as to the compliance of the labelling with the Community Catalogue and the Community Codes referred to in Articles 25 and 26 of R. 767/2009/EC.</p> <p>(d) by claiming that it will prevent, treat or cure a disease</p> <p>(e) by claiming that it has particular nutritional purpose (PARNUT), but is not included in the list of PARNUTS in accordance with Article 10 of regulation 767/2009/EC (dietetic food)</p> <p>(f) by using colours, fonts and size obscuring or emphasizing the legal requirements unless the aim is to draw attention to precautionary statements</p>	<p>R. 767/2009, Art. 11.1 (a), (b), (c)</p> <p>R. 767/2009, Art. 13.3 (a) R. 767/2009, Art. 13.3 (b) R. 767/2009, Art. 14.2</p>
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5.2 CATEGORIES OF CLAIMS

5.2.1. Content claims

A content claim is a claim that refers to the presence, or a high or low inclusion level of a particular component such as a feed material, additive, nutrient, flavour, variety or other, in wording or by means of pictorial representation.

5.2.1.1 Component claims (major component s)

<p>Component claims refer to the presence of a particular feed material which can be accompanied by a qualifier</p> <p>Examples: + Bloggo with beef + Bloggo with liver + Bloggo with carrots and rice</p> <p>See Annex 5</p>	<p>R. 767/2009, Art. 17 (2) (a)</p>
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5.2.1.2 Component claims (minor component s)

<p>Component claim may refer to the presence of a particular minor component :</p> <p>Example: + Bloggo with parsley</p> <p>See Annex 5</p>	<p>R. 767/2009, Art. 17 (2) (a)</p>
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5.2.1.3 Nutrient and additive claims

<p>Nutrient & additive claims make reference to the presence or a specific level of a nutrient or additive, including fatty acids, minerals, vitamins, trace elements, amino acids etc. with no further connection to health effects</p> <p>Examples: + Bloggo contains vitamin E + Enriched with Omega 3 fatty acids</p>	
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5.2.2 Product descriptors

5.2.2.1 Use of the term "natural"

<ul style="list-style-type: none">• The term "natural" should be used only to describe pet food components (derived from plant, animal, micro-organism or minerals) to which nothing has been added and which have been subjected only to such physical processing as to make them suitable for pet food production and maintaining the natural composition. <p>Examples for acceptable physical processing of components:</p> <p><i>Freezing, concentration, extraction (without chemicals), drying, pasteurisation or smoking (without chemicals) <u>as far as they maintain the natural composition</u>. Microbiological and enzymatic processes or hydrolysis can support the term "natural". Natural fermentation processes (without the use of GMOs) can also support the use of the term natural.</i></p> <ul style="list-style-type: none">• Bleaching, oxidation by chemical, chemical treatment and similar processes exclude use of the term "natural".• Feed materials and additives containing or derived from GMOs also exclude use of the term "natural".• If a compound pet food contains only feed materials, additives and carriers meeting the above sections, it may be described as "natural" as long as it has not been subjected to processes other than those acceptable processes for "natural components".• The terms "made with natural ..." may be used provided that the natural components are clearly identified.• If a compound pet food contains only feed materials/additives/carriers meeting the above sections, but also contains vitamins and minerals from non natural source, the following claim shall be allowed: made with natural component s, with added vitamins and minerals. <p>Example : + Bloggo, prepared with natural carrots</p>	
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5.2.2.2 Use of the term “fresh”, “authentic”, “real”, “true”, “genuine”, etc.

The term fresh may be used to describe pet food components that have not been subjected to any treatment except maintaining the cold chain. Treatments such as cooking, drying, freezing, hydrolysis, or similar processes, or the addition of salt, curing agents, natural or synthetic chemical preservatives or other processing aids exclude the components from being called “fresh”.

Example: + Bloggo made with/produced from fresh chicken

The current, widespread use of terms such as “authentic” and related terms like “real”, “genuine” and “true” etc. in relation to individual components (e.g. “made with real fruit juice”) is generally unjustified and repetitive. Such use may be taken to imply that the food or its components possess higher compositional quality than other similar products.

Such terms should only be used in the following circumstances:

- to emphasise the geographic origin of a product, for example where it might be confused with other products of the same name that do not originate from that location, e.g. “authentic Mexican honey”, **provided that** the product has the characteristics traditionally associated with the product from that geographic origin;
- to describe the recipe used to make a product, the origin of which is specified, e.g. “authentic Japanese tofu recipe”;
- to emphasise the purity of single varieties of components where such purity is essential to deliver specific characteristics.

Under these circumstances it is unlikely that pet food would qualify for these descriptions, although the feed materials included in it could be.

Example: + Bloggo made with authentic Hereford Beef.

It is recommended that the use of these terms should be considered carefully and implemented **only** where the product is sufficiently different to others in the same range. Care should be taken not to mislead - for example it may not be helpful to use “real” to emphasise the presence of fish pieces when they are present only at a low percentage level.

As with all claims, manufacturers must be able to support any such claims that are made.

“Authentic” and similar terms should not otherwise be used, without qualification, to describe either a pet food or a feed material.

5.2.2.3 Use of the terms “organic” or “organically produced” pet food

See point 3.2.1.15

5.2.2.4 Claims on the absence and negative claims

“No added...”, “without added...”, “formulated without”, “made without”

Use of the words “no added Y”, “without added Z” implies that the substance has not been added to the product either directly via formulation or indirectly via feed materials or additives. Traces of the substance would be acceptable under the principles of the FEDIAF Guide of practice for the manufacture of safe pet food.

Example: + “made without wheat” where no wheat is added to the recipe or via vitamin premixes, but very small traces may occur from line cross contamination.

<p>“Free ...” / “free from” Use of the words “free from Y” implies that there are not even traces of the substance Y, except for specific circumstances, e.g. Codex Alimentarius standard for “gluten free”</p> <p style="padding-left: 40px;">Example: + “wheat free” where not even traces of wheat are present + “gluten free” max 20mg/kg gluten</p> <p>These negative claims or claims on absence should not directly, indirectly or implicitly</p> <ul style="list-style-type: none"> - be used if all similar goods in the same category or class or all pet food do not contain the substance in question - give the impression that products containing that particular substance/feature are dangerous 	<p>CODEX STAN 118 - 1979</p> <p>R. 767/2009 Art 11.1 (b)</p>
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5.2.2.5 Light

<p>When a product is called “light” without any reference to a specific nutrient or other substance (light in XX), the term light refers to a reduction in energy content compared to a comparable pet food. In order to make the claim, the energy density of the product should be at least 15 % lower than a comparable standard adult maintenance pet food within the same brand or competitor’s comparable products (in which case Comparative Claims section should be referred to). Methods used to determine the energy density of a product are described in FEDIAF Nutritional Guidelines.</p>	<p>Fediaf Nutritional Guidelines, p. 37</p>
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5.2.2.6 Indication of high/increased or low/reduced level

<p>The percentages of reduction/increase are measured against a reference standard adult maintenance pet food of the same product range within the same brand, unless otherwise specified. Alternatively, the reference can also be a comparable standard pet food from another producer (in which case Comparative Claims section should be referred to).</p> <ul style="list-style-type: none"> - Reduced < 15% - Increased > 15 % <p>When used for macro-nutrients, the terms reduced or increased must be verifiable via recipe control. Different percentages may be used on the basis of scientific evidence. “High” and “low” claims are absolute and claimed levels need to be substantiated.</p> <p style="padding-left: 40px;">Example: + “high in protein for working dogs”</p>	
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5.2.2.7 Comparative claims to competitors’ products

<ol style="list-style-type: none"> 1. Comparative advertising shall, as far as the comparison is concerned, be permitted when in accordance with the directive on misleading and comparative advertising. 2. Comparative claims such as “reduced”, “less than”, “fewer”, “increased”, “more than”, “better” are claims that compare the nutrient level and/or energy, or other characteristics or functions of two or more foods. 	<p>D. 2006/114</p>
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5.2.3 Functional claims

There is scientific evidence that particular feeds and healthy life style can make a significant contribution towards the promotion of health (e.g. support the immune function) and reduction of disease risk (e.g. decrease the risk of developing joint disease).

A Functional Claim describes the effect of a pet food or a nutrient, component or additive in the pet food on growth, development or normal functions of the body. This provides a specific physiological benefit and may concern "optimisation of the nutrition and support or protection of the physiological conditions" (R. 767/2009, Art. 13.2).

These effects go beyond meeting basic nutritional needs of the animals.

Reminder: drawing particular attention to a nutrient will require its declaration either in the Composition or Analytical Constituents, as appropriate.

5.2.3.1 General principles for functional claims

Functional claims shall follow the same general principles as claims in general (see section 5.1).

5.2.3.2 Nutrient function claims

A nutrient function claim simply links the presence of a nutrient/combination of nutrients, contained in a product, to the physiological role in growth, development and normal functions of the body, without any further detail about level or degree/mechanism of the effect.

Examples: + Contains calcium for strong healthy bones and teeth.
+ Vitamin E helps to protect the fat in body tissues from oxidation.

R. 767/2009 Art. 13 (1)

5.2.3.3 Enhanced function claims

An enhanced function claim describes the specific beneficial effect of nutrients or other substances, alone or in combination, on physiological functions or biological activities beyond their established role in growth, development and normal functions of the body. No reference should be made to particular diseases or pathological states.

Example: + Contains antioxidants to support the immune system.
+ Contains chicory to improve growth of beneficial bacteria in the gut.

5.2.3.4 Health maintenance and decreased disease risk claims

Such claims relate to the consumption of a nutrient or other substances, alone or in combination that help reduce the risk of disease development or maintain physiological functions or health.

Example: + Bloggo contains omega 3 fatty acids to maintain healthy joints.

Claims referring to treatment, curing or prevention of a disease are considered to be medicinal claims and would cause a product to be medicinal by presentation.

However, words such as prevent may be used if not related to a disease.

Examples: + "prevents hairballs"

R. 767/2009, Art 13 (2), (3)

+ "prevents build-up of tartar"		
<p>Certain words may be considered medicinal as they are normally associated with authorised medicinal products. As a guideline the next table provides some examples of words that should be avoided and terms that are not normally considered a medicinal claim and hence can be used. These may vary from country to country and national/local advice should be sought.</p> <p>When using substances supporting health maintenance and decreased disease risk claims, operators shall ensure that the relevant substance is properly classified as an additive, a feed material or a biocidal substance; if it is classified as a veterinary medicinal product, it may not be used in pet food. In case of unclear classification, the Commission Guidelines shall be consulted.</p>		Rec. 2011/25
<p><i>Non-exhaustive examples :</i> <i>Considered medicinal - should be avoided</i></p> <ul style="list-style-type: none"> ~ Dose ~ Dosage ~ Cures ~ Treatment ~ Remedy ~ Prevent ~ Relieves ~ Treat ~ Heals ~ Repairs 	<p><i>Non-exhaustive examples :</i> <i>May not be considered as medicinal</i></p> <ul style="list-style-type: none"> ~ Use ~ Administration ~ Application ~ Soothes ~ Preparation ~ Maintains ~ Apply ~ Cleanses ~ Health/healthy 	
<p><i>Other non-exhaustive examples of words that can be used</i> helps, provides, for, supports...</p>		

5.2.3.5 Particular nutritional purposes and functional claims

<p>Functional claims should be clearly separated from particular nutritional purposes diets. However, this does not prevent PARNUT products from making additional functional claims.</p> <p>Examples: + Besides the statutory statements "Bloggo dietetic pet food for cats for reduction of struvite stone recurrence" the functional claim "with fish oil for a shiny coat" can be used</p>	
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5.3 SUBSTANTIATION RULES

5.3.1 General Substantiation

A claim in advertising, labelling or promotion must be supported by sufficient evidence at the time the product is placed on the market. Whilst all claims must be verifiable and substantiated, the degree of substantiation will depend on the type of claim made.	
<ul style="list-style-type: none"> ⇒ It is the responsibility of the feed business operator or the person placing the product on the market to be capable of substantiating commercial communications on pet food products. ⇒ On request, the responsible person putting the product on the market has to produce all relevant elements of substantiation to the competent authority. ⇒ Substantiation will protect the purchaser against false claims and enable him/her to make an informed purchase decision. ⇒ Well substantiated claims will allow industry to offer benefits to pets and their owners and will lead to continued investments for innovation. ⇒ The nature and type of the claim used will determine the level of substantiation. Depending on the type of claim, it can be made on the basis of general knowledge (generic claims), or may need scientific evidence (innovative claims). ⇒ Scientific evidence can consist of existing scientific publications, published or unpublished new research or a mixture of the two. ⇒ The dossier of substantiation/supporting evidence must be available at the time of product launch. 	R. 767/2009, Art. 13

5.3.2 Content & product descriptor claims substantiation

Reference to the presence or content of one or more feed material, additive, nutrient, flavour, variety or other, in wording or by means of pictorial representation shall follow longstanding industry practice and quantities shall be indicated on the label. .	
<ul style="list-style-type: none"> a) Re-hydration of dried feed materials can support a content claim, provided that the re-hydration factors of this Code are applied (see annex 5). b) In multi-component products, the inclusion level can be declared per component, provided that the components can be clearly identified by colour, shape, or other similar means and if the inclusion level per component is indicated. c) Claiming a minimum or maximum level of inclusion of additives and/or nutrients excludes any tolerance for the amount included. Examples: "maximum 5% fat", "minimum 20% fibre" "minimum 80% of daily requirements in vitamin C" d) A valid scientific method of analysis must be available for nutrients that are claimed. e) For minor components, the formulation should contain a level that adds nutritive or other beneficial effect and/or characterises the product 	

5.3.3 Functional claims substantiation

Pet food may have a direct positive effect on health which is beyond meeting the nutritional requirements. This can be the case for complete pet food which provides all required nutrients, as it can be for complementary pet food which can provide certain specific benefits to the pet animal.
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The level of substantiation depends on whether the claim can be considered to be “generic” or “well established” on the one hand, or whether it is “innovative”.

- a) The pet food in question (or the components) must cause or contribute to a positive physiological benefit when consumed by the target species
- b) In all cases of functional claims it is necessary to be able to substantiate that
 - the constituent contributes to a beneficial effect.
 - the constituent contributing to the beneficial effect is present in the pet food product in sufficient quantities to produce the effect claimed.

See Annex 6

5.3.3.1 Generic nutrition and health claims

Generic claims are those for which well- established knowledge exists. Their substantiation level is based on general (scientific) knowledge and these claims may be used based on sufficient content to produce the beneficial effect.

- a) A generic nutrition or health claim may be used
 - if data are well established in scientific literature and generally accepted
 - if a sufficient quantity of the component is present in the product to produce the claimed effect when consuming the pet food product in normal quantities.
- b) On request by the competent authority, the company making the claim has to produce evidence that the claim in question is widely accepted (generic).
- c) This substantiation on request should be on the basis of published literature and the recipe of the pet food product showing that the specific characteristics* needed to produce the beneficial effect are present.

* It is not necessarily a substance that provides an effect but it may be a specific way of processing or a combination of the two substances and processing.

5.3.3.2 Innovative nutrition and health claims

For innovative functional claims it is necessary to be able to substantiate that the constituent contributing to the beneficial effect is present in the pet food product in sufficient quantities to produce the effect claimed.

- a) The effect must be maintained over the whole period of time that the food with the specific characteristic is given to the animal and cannot be a short term response to which the body adjusts, unless a short or medium term benefit is specifically wanted and relevant.
- b) For complete pet food, the amount of pet food recommended in the feeding code should reflect the amount of the product needed to obtain the claimed effect and be an amount that the target animal can consume on a regular basis without detrimental effects e.g. weight gain.
- c) For complementary pet food the minimum or maximum amount and frequency of consumption required to achieve the claimed effect must be achievable and be clearly indicated in the feeding instructions
- d) The claim must be based on a systematic review of all data, not only data supporting the claim, and the available scientific evidence relating to the validity of the claim including published scientific literature.
- e) Where the claim is based on in-house or outsourced company research not in the public domain, the competent authority may request the relevant findings from the responsible company.

5.3.4 Claims relating to particular nutritional purposes

Pet food intended for particular nutritional purposes means pet food which, by virtue of their particular composition or method of manufacturer, can be clearly distinguished from both ordinary pet food and medicated pet food and which are presented as intended to meet specific nutritional requirements.

They have the purpose of satisfying the specific nutritional needs of certain pets whose process of assimilation, absorption or metabolism could be temporarily impaired or is temporarily or irreversibly impaired and therefore are able to derive benefit from ingestion of pet food appropriate to their condition.

Claims related to dietetic products are controlled. Claims about particular nutritional purposes, can only be made for those indications that are laid down in ANNEX Part B of Commission Directive 2008/38/EC.
The claims should be within the meaning of these Directives and be substantiated by research (see substantiation of functional claims).
However, this does not prevent PARNUT products from making additional functional claims.

R. 767/2009, Art. 10

D. 2008/38

5.3.5 Comparative claims

Comparative claims can be made with other products of the same company or a previous version of the same product.

Comparative claims can also compare a product of one company with a similar competitor product, or claim to have unique characteristics not met by competitors.

Companies may want to claim superiority, parity or exclusivity of a product based on nutrient levels, components used or the effect in the animal. Companies may claim superiority based on the appreciation by the owner and/or pet.

- a) For comparisons made about nutrient or component levels, records of published data or analyses should be available for all products mentioned in the claim. The substantiation needed per product must meet the same requirements as defined under "2. Substantiation of content and product descriptor claims".
- b) For claims comparing an effect on body functions, records or publications of studies evaluating the efficacy of the compared products must be available for substantiation. These substantiation pieces should meet the same criteria as described under "3. Functional claims".
- c) Company records must be available to show that the product(s) on the market is (are) still the same as the product(s) tested for the claim.

D. 2006/114

6. ANNEXES

Annex 1

Categories of feed materials which may be indicated in place of individual feed materials as defined in D. 82/475

Description of the category	Definition	Reference
1. Meat and animal derivatives	All the fleshy parts of slaughtered warm-blooded land animals, fresh or preserved by appropriate treatment, and all products and derivatives of the processing of the carcase or parts of the carcase of warm-blooded land animals	Annex to D. 82/475
2. Milk and milk derivatives	All milk products, fresh or preserved by appropriate treatment, and derivatives from the processing thereof	"
3. Eggs and egg derivatives	All egg products fresh or preserved by appropriate treatment and derivatives from the processing thereof	"
4. Oils and fats	All animal and vegetable oils and fats	"
5. Yeasts	All yeasts, the cells of which have been killed and dried	"
6. Fish and fish derivatives	Fish or parts of fish, fresh or preserved by appropriate treatment, and derivatives from the processing thereof	"
7. Cereals	All types of cereals, regardless of their presentation, or products made from the starchy endosperm	"
8. Vegetables	All types of vegetables and legumes, fresh or preserved by appropriate treatment	"
9. Derivatives of vegetable origin	Derivatives resulting from the treatment of vegetable products, in particular cereals, vegetables, legumes and oil seeds	"
10. Vegetable protein extracts	All products of vegetable origin in which the proteins have been concentrated by an adequate process to contain at least 50% crude protein, as related to dry matter, and which may be restructured (textured)	"
11. Minerals	All inorganic substances suitable for animal feed	"
12. Various sugars	All types of sugar	"
13. Fruit	All types of fruit, fresh or preserved by appropriate treatment	"
14. Nuts	All kernels from shells	"
15. Seeds	All types of seeds as such or roughly crushed	"
16. Algae	Algae, fresh or preserved by appropriate treatment	"
17. Molluscs and crustaceans	All types of molluscs, crustaceans, shellfish, fresh or preserved by appropriate treatment, and their processing derivatives	"
18. Insects	All types of insects and their stages of development	"
19. Bakery products	All bread, cakes, biscuits and pasta products	"

TOLERANCES FOR ANALYTICAL CONSTITUENTS AND ADDITIVES

The following tolerances are permitted when the deviation is found with the labelled value of the feed material or compound feed.

Where numerical claims are made e.g. "less than 2% fat" or constituent levels are determined as part of a PARNUT approval, these tolerances do not apply.

Crude protein and crude oils* and fats*:

Content in %	≥ 24 %	16 ≤ x < 24 %	< 16 %
Permitted tolerance	3 % absolute	12.5% of the declared value	2 % absolute

* the permitted deviation to the upper side may be up to twice the tolerance to the lower side

Example: When there is a declared Crude Protein of:

- 25 %; the minimum will be 22 %, the maximum will be 28 %
- 22 %; the minimum will be 19.25 %, the maximum will be 24.75
- 7 %; the minimum will be 5 %, the maximum will be 9 %

Example: When there is a declared Crude Oil of:

- 16 %; the minimum will be 14 %, the maximum will be 20%
- 7 %; the minimum will be 5,0 %, the maximum will be 11 %

Crude ash:

Content in %	≥ 24 %	8 ≤ x < 24 %	< 8 %
Permitted tolerance	3 % absolute	12.5% of the declared value	1 % absolute

Example: When there is a declared Crude ash of:

- 3 %; the minimum will be 2,0 %, the maximum will be 4 %

Crude fibres, sugar* and starch*:

Content in %	≥ 20 %		10 ≤ x < 20 %	< 10 %	
Permitted tolerance	3.5 % absolute		17.5% of the declared value	1.7 % absolute	

* the permitted deviation to the upper side may be up to twice the tolerance to the lower side

Example: When there is a declared Fibre of:

- 21 %; the minimum will be 17.5 %, the maximum will be 24.5 %
- 11 %; the minimum will be 9.1 %, the maximum will be 12.9
- 4 %; the minimum will be 2.3 %, the maximum will be 5.7 %

Ash insoluble in hydrochloric acid, total Phosphorus, Calcium*, Sodium* Potassium* and Magnesium*:**

Content in %	≥ 5 %	1 ≤ x < 5 %	< 1 %
Permitted tolerance	1. % absolute	20% of the declared value	0.2 % absolute

* The permitted deviation to the upper side may be up to twice the tolerance to the lower side

** For ash insoluble in hydrochloric acid only the tolerance to the upper side will apply. Levels exceeding 2.2% dry matter will trigger the labelling provisions as described in annex I no. 5 of Regulation 767/2009

Example: When there is a declared Calcium of:

- 1.2 %; the maximum will be 1.68 %, the minimum will be 0.96 %
- 0.9 %; the maximum will be 1.3 %, the minimum will be 0.7 %

Moisture (only tolerance on the upper side will apply):

Content in %	$\geq 12.5 \%$	$5 \leq x < 12.5 \%$	$2 \leq x < 5 \%$	$< 2 \%$
Permitted tolerance	8 % of the declared value	1 % absolute	20 % of the declared value	0.4 % absolute

Example: When there is a declared Moisture of:

- 11 %; the maximum will be 12 %, No minimum
- 20 %; the maximum will be 21.6, No minimum
- 80 %; the maximum will be 86.4 %, no minimum

For feed additives in the list of feed additives, tolerances include technical deviations only and these additives must be labelled with their added amount (documented control only).

In the addition to the analytical deviations, these technical deviations also apply to the levels declared in the list of analytical constituents and are analysed at the end of shelf life.

In case of vitamins the level of which decreases over time the level found should always be between the guaranteed level and the maximum permitted limit (where applicable) when analysed before the end of shelf life.

The following tolerances apply to the lower side, the tolerances to the upper side can be three times as high as long as the legal maximum is not exceeded

Content in units	≥ 1000 units	$500 \leq x < 1000$	$1 \leq x < 500$	$0.5 \leq x < 1$	< 0.5
Permitted tolerance	10 % of the declared value	100 units	20 % of the declared value	0.2 units	40 % of the declared value

The examples below only apply to tolerances for additives labelled in the list of additives.

Examples of tolerances for additives labelled in the list of analytical constituents cannot be given because the analytical tolerances are not defined.

Example: When there is a declared Taurine level of:

- 1400 mg/kg the minimum will be 1260 mg/kg, the maximum will be 1820 mg/kg

Example: When there is a declared Vitamin E level of:

- 520 mg/kg the minimum will be 420 mg/kg, the maximum will be 820 mg/kg

Example: When there is a declared Copper level of:

- 18 mg/kg the minimum will be 14.4 mg/kg, the maximum will be 28.8 mg/kg

Example: When there is a declared Beta-Carotene level of:

- 0.6 mg/kg the minimum will be 0.4 mg/kg, the maximum will be 1.2 mg/kg

Example: When there is a declared Selenium level of:

- 0.15 mg/kg the minimum will be 0.09 mg/kg, the maximum will be 0.33 mg/kg

For additives tolerances, 1 unit in this paragraph means 1 mg, 1 000 IU, 1×10^9 CFU or 100 enzyme activity units of the respective feed additive per kg/feed

Explanatory notes on GMOs

Products produced or obtained from GMOs are defined as:

- 1) feed that contain GM DNA, that have been submitted to a treatment or a transformation process, such that they are not able to reproduce but the presence of modified DNA is detectable through analysis*
- 2) feed that do not contain GM DNA because they have been produced through a transformation process which results in an absence of DNA or because they are a metabolic product of a GMO*

Examples: + highly refined oil from GM soya;
+ lecithin extract from GM soya; vitamin produced from GM micro-organism;
+ by-products from GM corn (extracted meal, corn gluten, feed, flakes);
+ by-products from GM soya (roasted soya, extracted meal, protein extract)

Producers should note that a negative PCR test does not automatically demonstrate product is GM free, and it is recommended that for materials known to be open to contamination (e.g. soya, corn, maize) Identity Preserved sources are used.

Guidance for a check-list for a pet food label

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment
Product description			
Animal species			
Instructions for proper use			
Quantity per day			
For dry products : always ensure fresh water sentence			
Storage conditions before and after opening			
Feed material declaration by categories? Is the heading: "Composition" present?			
<ul style="list-style-type: none"> • Are the feed materials grouped into the correct categories 			
<ul style="list-style-type: none"> • If yes are the categories classified by descending order of weight 			
Feed material declaration by specific names? Is the heading: "Composition" present?			
<ul style="list-style-type: none"> • Are the feed materials used correctly named? (consistent with raw material specification or entry in feed material catalogue as appropriate) 			
<ul style="list-style-type: none"> ▪ If yes are the feed materials labelled by descending order of weight 			
If particular attention is drawn, ensure specific declaration			
Is the claim substantiation material available?			
Additives: is the heading: "Additives" present? labelling of antioxidant, colourant, preservative if appropriate,			
Additives: labelling of vitamins/trace elements if appropriate			
Additives: labelling of functional groups if appropriate			
Additives: labelling of enzymes or micro-organisms			
Is the heading: "Analytical constituents" present? Are the necessary analytical constituents for the animal species in question present?			
Business address and easy contact data (address, website, e-mail, phone number or other...) for customers			
Traceability tools: batch number, establishment approval number			
Sentence if traceability tools are placed outside the statutory box			
Best before date			
Net quantity			
GMOs if appropriate			
Other considerations: Dietetic? Organic? Multipack? Free Sample? Check section to ensure you comply!			
Are all the optional declarations permitted?			
Environmental labelling if appropriate			

Content claims

When a content claim is made on packaging, declaration of the claimed component/additive/nutrient is required.

KEY: Bloggo – a hypothetical brand name
X or Y – represents a species claim (beef, chicken, etc) OR cut/type (liver, kidney, etc.) OR other component such as vegetables or cereals

DEFINITIONS:

All parts used under this definition must be authorized for use in pet food production under the Animal By-Products Regulation 1069/2009

SPECIES:

All parts of authorized species with the **exception** of: claws; hair; horns; hide (with the exception of pork rind); feathers; teeth; beaks; hooves; intestinal content; added fat
Species claims cannot be based on blood and bone alone.

It is advised that the claim be supported by at least 15% of the claim material being tissue where tissue means smooth or fibrous muscle and organs.

Contributing: heart, aorta, kidney, lung, carcass meat, liver.

Not contributing: blood, bone, collagen or other connective tissue

In the specific case of fish/shellfish: all parts of authorized species may be used - this allows for the non-removal of intestinal tract contents – however mollusc claims, for example, cannot be based solely on the incorporation of shell.

In all cases, the formulation should contain required level of the named feed material.

The regulation states that:

- the name and percentage of weight of a feed material shall be indicated if its presence is emphasised on the labelling in words, pictures or graphics

COMPONENT CLAIMS:

In all cases the calculation is based on mixing bowl principle.

A **major component** means a feed material which provides nutritional value or provides essential characteristics of the pet food product and which can be incorporated in the recipe in amounts defined in this annex without compromising the nutritional balance of the pet food product.

A **minor component** means a feed material which is only added in small amounts that contribute either to the nutritional value or the appearance or palatability of the pet food product.

In all cases:

Legal Basis: R. 767/2009

Substantiation Requirements: Formulation should contain required level of named claim material, species or cut as specified in this annex.

The correct percentage of the claimed component's inclusion must be labelled; however, the inclusion level being an emphasis and a product quality characteristic, tolerances to the lower side are not permitted whereas the inclusion level may vary from the labelled amount to the upper side for components increasing the pet food's quality/value characteristics.

Major Component		
Claim Type	Example description	Value corresponding to required level of named material
Bloggo X flavour	bacon flavour	0% of the named major component , but taste comes from the flavouring substance It will be necessary to declare the flavouring in the additives section, Example: Additives: Sensory additives: beef flavouring X mg/kg N. B. It is necessary to label the added amount of the flavouring irrespective whether a legal maximum limit applies to any component of the flavouring, since the presence of the flavouring characterises the pet food.
Bloggo flavoured with X	flavoured with X flavoured with Y Multiple claims (flavoured with X and Y) Example: + Bloggo flavoured with rabbit	> 0% of the named major component , but less than 4%
Bloggo with X Bloggo contains	With X With Y With X & Y Contains X Contains X & Y Examples: + Bloggo with chicken + Bloggo with chicken liver + Bloggo with chicken and rice + Bloggo contains rabbit	At least 4 % of the named material, or at least 4 % of each of the materials mentioned. At least 4 % of chicken At least 4 % of chicken liver At least 4 % of chicken and at least 4 % of rice At least 4 % of rabbit
Bloggo rich in X high in with extra	High in X (or Y) Rich in X (or Y) With extra X (or Y) Extra X (or Y) High in X and Y Examples: + Bloggo high in chicken + Bloggo high in chicken with rice + Bloggo extra chicken with rice + Bloggo high in chicken and rice	At least 14 % of the named material or at least 14 % of each of the materials mentioned. At least 14 % of the chicken At least 14 % of chicken and at least 4 % of rice At least 14 % of chicken and at least 4 % of rice At least 14 % of chicken and at least 14 % of rice

<p>Bloggo X</p> <p>Bloggo X menu</p> <p>Bloggo X dinner</p>	<p>Brand name X</p> <p>Brand name Y</p> <p>X dinner - Y dinner</p> <p>X menu - Y menu</p> <p>Examples:</p> <p>+ Bloggo beef and chicken</p> <p>+ Bloggo beef and poultry menu</p>	<p>At least 26 % of the named material.</p> <p>Or at least 26 % of each of the materials mentioned</p> <p>At least 26 % of beef and at least 26 % poultry</p>
<p>Bloggo All X</p>	<p>All X (or Y)</p> <p>Only X (or Y)</p> <p>Examples:</p> <p>+ Bloggo all beef in jelly</p> <p>+ Bloggo dry vegetarian, all vegetable</p> <p>+ Bloggo dry vegetarian, all tofu</p>	<p>All materials with no other ingredients present except permitted additives, nutrient supplements and water for processing.</p>

NOTE:

Where manufacturers choose to make a claim for gravy/jelly/sauce, for example, the above principles apply mutatis mutandis to the gravy/jelly/sauce

Example: Bloggo high in chicken, in gravy with tomato (e.g. at least 4% tomato in the gravy)

Minor Components		
Claim Type	Substantiation requirements	Labelling Requirements
<p>Bloggo with parsley</p> <p>Bloggo with chicory</p> <p>Mint Bloggo</p> <p>Bloggo honey*</p>	<p>Formulation should contain level that adds nutritive or other beneficial effect and/or characterises the product.</p>	<p>Minimum content must be declared in composition list. Addition level should be sufficient to characterise or deliver product benefits.</p> <p>* honey can be considered as both a major and a minor component depending upon usage and context; it is the responsibility of the individual manufacturer to substantiate usage and context</p>
<p>Contains nutrient/additive:</p> <ul style="list-style-type: none"> - With /Contains taurine - With /Contains naturally occurring taurine <p>Source of nutrient/additive:</p> <ul style="list-style-type: none"> - Source of calcium - Natural source of taurine 	<p>Justification (see section 5.3.2)</p>	<p>When content claim is made on packaging, declaration of an component /additive/nutrient content is required</p> <p>Refer to sections on additives and analytical constituents for declaration rules</p>

Justification of content claims, when using dehydrated components

For the justification of claims, moisture level must be based on officially published literature.

Indicative values are:

- 90 % for vegetables (i.e. 10 % dry matter)
- 75 % for meat/fish/crustacean components
(i.e. 25 % dry matter)
- 15 % for cereals (i.e. 85 % dry matter)

NOTE: These are **indications** only – for specific rehydration factors refer to literature data such as McCance and Widdowson's Composition of Foods OR supplier specification.

The following web links may also be helpful.

<http://www.food.gov.uk/science/dietarysurveys/dietsurveys/>

The UK Food Standards Agency Website, where an electronic version of McCance and Widdowson's Composition of Foods is available.

http://www.ars.usda.gov/main/site_main.htm?modecode=12-35-45-00

The US Department of Agriculture Nutrient Data Laboratory website also provides reference values.

Manufacturers must be able to support claims in all instances

When used, supplier information must support the calculation of rehydrated components.

Where substances OTHER than moisture have been removed the name of the component declared in the Composition list must indicate this. The same principle will apply to extracts, or use of feed materials where a beneficial component has been removed – for example the use of "carrot" material where the carotene has been extracted.

Finished products containing less than 14 % moisture (dry products) or semi-moist products

To avoid misleading purchasers, in order to make a claim for a component added in a dehydrated or concentrated form, all dehydrated or concentrated components must be rehydrated and the claim will be ***based on the percentage*** of the claimed component ***in the rehydrated form***.

Examples for substantiation of content claims when using rehydration factors for pet foods

Wet petfood

The percentage of a claimed feed material has to be understood as the number of kg of this feed material used to manufacture 100 kg of the finished product:

e.g. the following would support a "with carrots" claim:

feed material (a)	=	42 kg
feed material (b)	=	35 kg
feed material (c)	=	16 kg
carrots (not dehydrated)	=	4 kg
feed material (d)	=	<u>2 kg</u>
feed material (e)	=	1 kg
total	=	100 kg

Composition: feed material (a), feed material (b), feed material (c), carrots (4 %), feed material (d), feed material (e)

In the case of feed materials used in concentrated or dehydrated form and rehydrated at the time of manufacture, the calculation shall be based on the weight as recorded before their concentration or dehydration:

e.g. the following would support a "with carrots" claim when in the mixing bowl only the carrots are dehydrated:

feed material (a)	= 42 kg
feed material (b)	= 35 kg
feed material (c)	= 18.2 kg
feed material (d)	= 2 kg
feed material (e)	= 2 kg
dried carrots (8 % moisture)	= 0.8 kg
total	= 100 kg

0.8 kg dried carrots x 92 % dry matter = 0.736 kg.
 Rehydration to 90 % results in: 0.736 ÷ 0.10 = 7.36 kg rehydrated product.

It will support the claim "with carrots"

Composition:

feed material (a), feed material (b), feed material (c), carrots (7.4 % from dried carrots), feed material (d), feed material (e)

Example dry/semi-moist pet food

In a dry product rehydration can be used to support a claim and/or a product descriptor. When a claim/product descriptor in dry pet food is based on rehydration, the calculation to support the claim may be based on rehydration which then must be applied to all dehydrated feed materials.

When rehydration is used to support a claim, the labelling in the descending order by weight in the composition must be based on the mixing bowl principle.

Raw Material	kg/100kg (%) mixing bowl	Dry Weight Basis in recipe	Rehydration ratio (%)	Rehydrated weight in recipe	% rehydrated weight in totally rehydrated recipe
feed material (a)	66.0	59.4	15.0	69.9	37.3
feed material (b)	24.2	21.8	75.0	87.1	45.5
feed material (c)	1.8	1.6	75.0	6.4	3.4
carrot powder	2.0	1.8	90.0	18.0	9.7
feed material (d)	4.0	4.0	0	4.0	2.1
feed material (e)	2.0	2.0	0	2.0	1.1
Total	100.0			187.5	100.0

The claim "with carrots" will be supported, but not a claim "with feed material (d)". Rehydration will not affect the composition listing:

Composition:

feed material (a), feed material (b), feed material (d), feed material (e), dried carrots 2 %*, feed material (c)

* equivalent to 9.6 % of carrots (**Note:** This indication is voluntary)

Guidance for a check list for the scientific dossier to substantiate functional claims

Chapter	Section	Generic (Established) 5.3.3.1	Innovative (Not yet established) 5.3.3.2	Comments
Summary (one page)	a. Description	X	X	
	b. Substantiation	X	X	
	c. Characteristics of the product essential to the claim (such as inclusion levels, process parameters, specific quality monitoring points to be implemented during production)	X	X	
	d. Products and pets (pet species/breed/etc)	X	X	
Packaging lay-out and other ways of communication	a. Name and description of the product, including: essential characteristics, identification of any components on which claims are based and inclusion level of the active nutrient/non nutrient, product recipe, as well as specific labelling requirements, intended use, warnings and contraindications	X	X	
	b. Claims	X	X	
	c. Example of pack lay-out and other communication tools (e.g. pack, leaflet, web, advertisement)	X	X	
	d. Date of introduction	X	X	
The science behind claims	a. Description	X	X	
	b. Published relevant literature	X	X	
	c. Research: - research centre which conducted the research, - research protocol, - study results, - references		X X X X	
	d. Scientific testimonials	X	X	
Bibliography	a. References	X	X	
	b. Abstracts or copies of scientific publications	X	X	

**SUMMARY TABLE OF
FoodDrinkEurope* BEST PRACTICE RECOMMENDATIONS FOR LEGIBILITY**

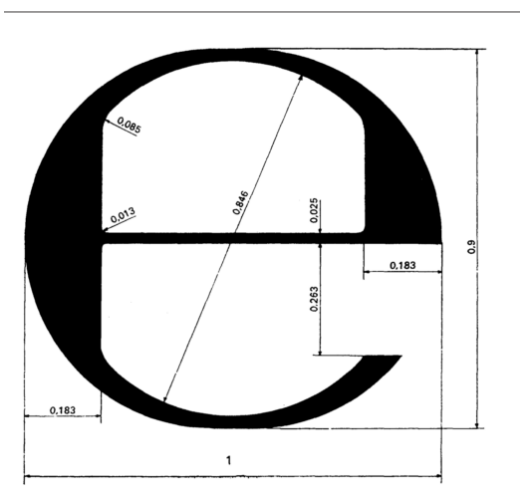
	<i>Recommended</i>	<i>Use with care</i>	<i>Best avoided</i>
<i>Layout</i>	<ul style="list-style-type: none"> -Headings to be clear, short and consistent; -Use bold type and/or upper case text to distinguish headings; -Where space allows, group information which belongs together; -Where appropriate, separate different groups of information with frames or boxes; -Text should start and be aligned with the left margin; -Use symbols to help reduce the quantity of text and direct the reader to information. 	<ul style="list-style-type: none"> -Extensive use of upper case and underlining; -Text in other format than blocks; -Text wrapping; -Centre alignment; -Text aligned with the right margin; 	<ul style="list-style-type: none"> -Over hyphenation of text; -Blocks of texts without headings, titles or any separation; -Placing a large amount of text with only one or two words on each line; -Placing the information in circles. -Too many or overly complex symbols.
<i>Font, Colour and Contrast</i>	<ul style="list-style-type: none"> -A letter height (x-height) of 1mm or more; -Adequate character spacing; -Inter-linear spacing of 120% of the font size; -Easy-to-read (sans serif) fonts; -Choose a typeface designed for use at small font size; -Clearly contrasting colours. 	<ul style="list-style-type: none"> -Letter height (x-height) below 1mm; -Inter-linear spacing of less than 120% of the font size Italic; -Serif typefaces; -Stylised, ornate decorative fonts; -Subtle contrasts, shadowing, 3D effects, watermarking or non uniform background; -Where packaging is transparent, good contrast is necessary with food product forming the visible background. 	<ul style="list-style-type: none"> -Character spacing condensed by more than 1pt; -Inter-linear spacing of less than 0,5pt more than the font size; -Colours with similar tonal contrasts - light type on a light background or dark type on a dark background;
<i>Packaging / Printing</i>	<ul style="list-style-type: none"> -High quality printing 	<ul style="list-style-type: none"> -Printing on deformation zones; -Heat sealed areas; -Plastic shrink wrap; -Metallic and shiny printing surfaces; 	<ul style="list-style-type: none"> -Labels printed on curved surfaces. -Zones of the packaging which are not directly accessible; -Areas where the destruction of the package is required to read the text.

Annex to the section 3.2.2.1 : EC mark "e"

All prepackages made up in accordance with this Directive shall bear on the package the following markings affixed in such a manner as to be indelible, easily legible and visible on the prepackage in normal conditions of presentation:

- 3.1.** The nominal quantity (nominal weight or nominal volume) expressed in kilograms, grams, litres, centilitres or millilitres, and marked in figures at least 6 mm high if the nominal quantity exceeds 1 000 g or 100 cl, 4 mm high if it is from 1 000 g or 100 cl inclusive down to but not including 200 g or 20 cl, 3 mm high if it is from 200 g or 20 cl down to but not including 50 g or 5 cl, 2 mm high if it is not more than 50 g or 5 cl, followed by the symbol for the unit of measurement used or where appropriate by the name of the unit in accordance with Directive 71/354/EEC, as last amended by Directive 76/770/EEC.
Markings in imperial (UK) units shall be in letters and figures of dimensions not larger than those of the corresponding markings in SI units.
- 3.2.** A mark or inscription enabling the competent departments to identify the packer or the person arranging for the packing to be done or the importer established in the Community;
- 3.3.** A small "e", at least 3 mm high, placed in the same field of vision as the indication of the nominal weight or nominal volume, constituting a guarantee by the packer or the importer that the prepackage meets the requirements of this Directive.

This letter shall have the form shown in the drawing contained in section 3 of Annex II to Directive 71/316/EEC:



Lists of additives with a maximum legal limit, which have to be labelled

Additives with a maximum level for any animal species must be labelled, i.e. even if they have no maximum level for the target (pet) animal species
It is recommended that manufacturers consult the EU Register of Feed Additives for the latest information on additives with a legal maximum

Antioxidants (can be labelled under their functional group)
<ul style="list-style-type: none"> • Propyl gallate • Octyl gallate • Dodecyl gallate • Butylated hydroxyanisole (BHA) • Butylated hydroxytoluene (BHT) • Ethoxyquin
Colours (can be labelled under their functional group)
<ul style="list-style-type: none"> • Tartrazine • Sunset Yellow FCF • Patent Blue V • Chlorophyll Copper Complex • Canthaxanthin
Preservatives (can be labelled under their functional group)
<ul style="list-style-type: none"> • Sodium bi-sulphite • Sodium Metabisulphite • Sodium nitrite
Flavouring compounds
<ul style="list-style-type: none"> • Neohesperidine dihydrochalcone
Emulsifiers
<ul style="list-style-type: none"> • Polyoxyethylene (20)-sorbitan monolaurate • Polyoxyethylene (20)-sorbitan monooleate • Polyoxyethylene (20)-sorbitan monopalmitate • Polyoxyethylene (20)-sorbitan monostearate • Polyoxyethylene (20)-sorbitan tristearate • Polyethylene glycol 6000 • Polyoxypropylene-polyoxyethylene-polymers (M.W. 6800-9000) • Cassia gum
Vitamins, pro-vitamins and chemically well defined substances having a similar effect
<ul style="list-style-type: none"> • Vitamin A • Vitamin D2 • Vitamin D3
Compounds of trace elements
<ul style="list-style-type: none"> • All compounds of all approved trace elements (Iron, Iodine, Cobalt, Copper, Manganese, Zinc, Molybdenum , Selenium)
Binders
<ul style="list-style-type: none"> • Bentonite-montmorillonite • Sepiolite • Sepiolitic clay • Natrolite-phonolite
Micro-organisms
<ul style="list-style-type: none"> • <i>Enterococcus faecium</i> DSM 10663/NCIMB 10415 • <i>Enterococcus faecium</i> NCIMB 10415 • <i>Lactobacillus acidophilus</i> DSM 13241
Other Zootechnical additives

Conversion factors - Vitamin source to activity					
Vitamin	Unit declared	Vitamin source used		Vitamin activity	
Vitamin A	IU			Retinol activity	
		vitamin A alcohol (retinol) ^{2, 3}	0.3 µg	=	1 IU
			1.0 mg	=	3,333 IU
		vitamin A acetate	0.344 µg	=	1 IU
		vitamin A propionate	0.359 µg	=	1 IU
		vitamin A palmitate	0.55 µg	=	1 IU
		vitamin A alcohol (retinol)	1.0 µg	=	1 RE
			(RE = Retinol Equivalent)		
		Provitamin A (β-carotene) (dogs) ⁴	1.0 mg	=	833 IU
Vitamin D Cholecalciferol	IU			Vitamin D activity	
		vitamins D ₃ & D ₂ ^{1, 3}	0.025 µg	=	1 IU
			1 µg	=	40 IU
Vitamin E - Tocopherol	IU			Vitamin E activity	
		dl-α-tocopheryl acetate (all-rac-α-tocopheryl acetate)	1 mg	=	1 IU
		Bio-equivalence of various tocopherols:			
		d-α-tocopherol	1 mg	=	1.49 IU
		d-α-tocopherol acetate ¹	1 mg	=	1.36 IU
		dl-α-tocopherol	1 mg	=	1.10 IU
		dl-α-tocopheryl acetate	1 mg	=	1.00 IU
		dl-β-tocopherol	1 mg	=	0.33 IU
		dl-δ-tocopherol	1 mg	=	0.25 IU
		dl-γ-tocopherol	1 mg	=	0.01 IU
Vitamin B1 - Thiamine	mg			Thiamine	
		thiamine mononitrate	1 mg	=	0.92 mg
		thiamine hydrochloride	1 mg	=	0.89 mg
D-Pantothenic acid	IU			Pantothenic acid	
		calcium D-pantothenate	1 mg	=	0.92 mg
		calcium DL-pantothenate	1 mg	=	0.41 - 0.52mg

Vitamin B6 - Pyridoxine	mg			Pyridoxine	
		pyridoxine hydrochloride	1 mg	=	0.89 mg
Niacin	mg			Niamin	
		nicotinic acid	1 mg	=	1 mg
		nicotinamide	1 mg	=	1 mg
Choline	mg			Choline	
		choline chloride (basis choline ion)	1 mg	=	0.75 mg
		choline chloride (basis choline hydroxyl-analogue)	1 mg	=	0.87 mg
Vitamin K3 - Menadione	mg			Menadione	
		menadione sodium bisulphite (MSB)	1 mg	=	0.51 mg
		menadione pyrimidinol bisulphite (MPB)	1 mg	=	0.45 mg
		menadione nicotinamid bisulphite (MNB)	1 mg	=	0.46 mg

REFERENCES

1. McDowell Vitamins in animal and human nutrition. 2nd edition Iowa State University Press 2000
2. Vitamins in animal nutrition, Arbeitsgemeinschaft für Wirkstoffe in der Tierernährung e. V. (AWT), 2002.
3. NRC. Table 2. In: Nutrient Requirements of Cats. National Academy Press, Washington, DC 1986: 42.
4. NRC. Composition of ingredients of dog foods. In: Nutrient Requirements of Dogs. National Academy Press, Washington, DC 1985: 40-41.

Example: Multilingual declaration of additives

Additives, Zusatzstoffe, Additifs, Additivi/kg:
Nutritional additives, ernährungsphysiologische Zusatzstoffe, additifs nutritionnels, additivi nutrizionali: E672, Vit. A 10.000 i.U./ i.E./ U.I. E671, Vit. D3 1.000 i.U./ i.E./ U.I E4, Copper, Kupfer, cuivre, rame 15mg
With colourants, mit Farbstoffen, avec colorants, con coloranti

Labelling of Categories and Functional Groups of Feed Additives

Category	Functional Group	Labelling
technological additives	<p>(a) preservatives: substances or, when applicable, micro-organisms which protect feed against deterioration caused by micro-organisms or their metabolites;</p> <p>(b) antioxidants: substances prolonging the storage life of feedingstuffs and feed materials by protecting them against deterioration caused by oxidation;</p> <p>(c) emulsifiers: substances that make it possible to form or maintain a homogeneous mixture of two or more immiscible phases in feedingstuffs;</p> <p>(d) stabilisers: substances which make it possible to maintain the physicochemical state of feedingstuffs;</p> <p>(e) thickeners: substances which increase the viscosity of feedingstuffs;</p> <p>(f) gelling agents: substances which give a feedingstuff texture through the formation of a gel;</p> <p>(g) binders: substances which increase the tendency of particles of feedingstuffs to adhere;</p> <p>(h) substances for control of radionuclide contamination: substances that suppress absorption of radionuclides or promote their excretion;</p> <p>(i) anticaking agents: substances that reduce the tendency of individual particles of a feedingstuff to adhere;</p> <p>(j) acidity regulators: substances which adjust the pH of feedingstuffs;</p> <p>(k) silage additives: substances, including enzymes or micro-organisms, intended to be incorporated into feed to improve the production of silage;</p> <p>(l) denaturants: substances which, when used for the manufacture of processed feedingstuffs, allow the identification of the origin of specific food or feed materials;</p> <p>(m) substances for reduction of the contamination of feed by mycotoxins: substances that can suppress or reduce the absorption, promote the excretion of mycotoxins or modify their mode of action.</p>	<p>Either <i>technological additives</i> or the following if added :</p> <p>(a) <i>preservatives</i></p> <p>(b) <i>antioxidants</i></p> <p>(c) <i>emulsifiers</i></p> <p>(d) <i>stabilizers</i></p> <p>(e) <i>thickeners</i></p> <p>(f) <i>gelling agents</i></p> <p>(g) <i>binders</i></p> <p>(h) <i>radionuclide reducers</i></p> <p>(i) <i>anticaking agents</i></p> <p>(j) <i>acidity regulators</i></p> <p>(k) <i>silage additives</i></p> <p>(l) <i>denaturants</i></p> <p>(m) <i>mycotoxin reducers</i></p>

sensory additives	<p>(a) colourants:</p> <ul style="list-style-type: none"> i. substances that add or restore colour in feedingstuffs; ii. substances which, when fed to animals, add colours to food of animal origin; iii. substances which favourably affect the colour of ornamental fish or birds; <p>(b) flavouring compounds: substances the inclusion of which in feedingstuffs increases feed smell or palatability.</p>	<p>Either <i>sensory additives</i> or the following if added</p> <ul style="list-style-type: none"> (a) <i>colourants</i> or <i>colours</i> (b) <i>flavourings</i> or <i>flavours</i>
nutritional additives	<ul style="list-style-type: none"> (a) vitamins, pro-vitamins and chemically well-defined substances having similar effect; (b) compounds of trace elements; (c) amino acids, their salts and analogues; (d) urea and its derivatives. 	<p>Either <i>nutritional additives</i> or the following if added</p> <ul style="list-style-type: none"> (a) <i>vitamins</i> (b) <i>trace elements</i> (c) <i>amino acids</i> (d) <i>urea</i>
zootechnical additives	<ul style="list-style-type: none"> (a) digestibility enhancers: substances which, when fed to animals, increase the digestibility of the diet, through action on target feed materials; (b) gut flora stabilisers: micro-organisms or other chemically defined substances, which, when fed to animals, have a positive effect on the gut flora; (c) substances which favourably affect the environment; (d) other zootechnical additives. 	<p>Either "<i>zootechnical additives</i>" or the following if added</p> <ul style="list-style-type: none"> (a) <i>digestibility enhancer(s)</i> (b) <i>gut flora stabilizer(s)</i> (c) <i>environmental substance</i> Note: the function must be specified (d) Note: the function must be specified

LEGISLATIVE AND NON-LEGISLATIVE REFERENCES

Note: For latest consolidated versions of EU legislation,
please search on the Europa website:

http://eur-lex.europa.eu/RECH_consolidated.do or contact fediaf@fediaf.org

(D. means Directive, R. means Regulation, Rec. means Recommendation)

Doc n°	Title	Official Journal
D. 71/316	on the approximation of the laws of the Member States relating to common provisions for both measuring instruments and methods of metrological control	L 202 – 6.9.1971 – p. 1
D. 76/211	relating to the making-up by weight or by volume of certain prepackaged products	L 46 – 21.2.1976 – p. 1
CODEX STAN 118 - 1979	CODEX ALIMENTARIUS standard for foods for special dietary use for persons intolerant to gluten	
D. 82/475	laying down the categories of feed materials for the labelling of compound feedingstuffs	L 213 - 21.07.82 - p. 27
D. 89/552	on the coordination of certain provisions laid down by Law, Regulation or Administrative Action in Member States concerning the pursuit of television broadcasting activities	L. 298 - 17.10.1989 - p. 23
D. 97/7	on the protection of consumers in respect of distance contracts	L. 144 - 4.6.1997 - p. 19
D. 98/51	laying down the conditions and arrangements for approving and registering certain establishments and intermediaries operating in the animal feed sector	L 208 – 24.7.1998 – p. 43
D. 2000/13	on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs	L 109 – 6.5.2000 – p. 29
D. 2001/18	on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220	L 106 - 17.4.2001 - p. 1
D. 2001/82	on the Community code relating to veterinary medicinal products	L 82 – 7.8.2009 – p. 1
R. 999/2001	laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies	L 147 – 31.5.2001 – p. 1
D. 2002/32	on undesirable substances in animal feed	L 140 – 30.5.2002 – p. 10
R. 178/2002	laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety	L 31 – 1.2.2002 – p. 1
R. 998/2003	on the animal health requirements applicable to the non-commercial movement of pet animals and amending Council Directive 92/65/EEC	L 143 – 13.6.2003 – p. 1
R. 1829/2003	on genetically modified food and feed	L 268 - 18.10.2003 - p. 1
R. 1830/2003	concerning traceability and labelling of GMOs and food and feed produced from GMOs	L 268 - 18.10.2003 - p. 24
R. 1831/2003	on additives for use in animal nutrition	L 268 - 18.10.2003 - p. 29
R. 882/2004	on official controls to ensure compliance with feed and food law	L 191 - 28.5.2004 - p. 1
R. 183/2005	laying down requirements for feed hygiene	L 35 - 8.2.2005 - p. 1

D. 2006/114	concerning misleading and comparative advertising	L 376 - 27.12.2006 - p. 21
R. 834/2007	on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91	L 189, 20.7.2007, p. 1
D. 2008/38	establishing a list of intended uses of animal feedingstuffs for particular nutritional purposes	L 62 - 6.3.2008 - p. 9
R. 889/2008	laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labelling of organic products with regard to organic production, labelling and control	L 250 – 18.9.2008 – p. 1
R. 767/2009	on the placing on the market and use of feed	L 229 - 1.9.2009 - p. 1
R. 1069/2009	laying down health rules concerning animal by-products not intended for human consumption, and	L 300 – 14.1.2009 - p. 1
R. 142/2011	implementing Regulation 1069/2009	L 54 – 26-2-2011 – p. 1
R. 575/2011	on the Catalogue of feed materials	L159 – 17.6.2011 – p.25
Rec. 2011/25	Commission recommendation establishing guidelines for the distinction between feed materials, feed additives, biocidal products and veterinary products	L 11 - 15.1.2011 - p. 75
R. 26/2011	concerning the authorisation of vitamin E as a feed additive for all animal species	L 11 – 15.1.2011 – p.18
./.	FEDIAF Nutritional Guidelines for Complete and Complementary Pet Food for Cats and Dogs	Click here or go to www.fediaf.org "self-regulation"
./.	European Union Register of Feed Additives	Click here for the latest version

Pet food labelling – A Guide for Customers

1. Introduction

This section is intended to provide you with more information about what different pieces of information on the label mean in order to help you to make a better more informed choice.

It is not an exhaustive guide, and you should be aware that you can contact pet food manufacturers directly for more information on individual products.

2. Why label pet food?

Pet food as any other animal feed needs to be labelled in accordance with the latest Regulations to ensure that you receive correct information about the product that you may wish to purchase.

You will find the following legally required information on pet food labels:

- Name and Product Description
- Composition (ingredients list)
- Analytical constituents (information about nutrient levels)
- Information about additives
- Best Before Date, Batch Code
- The name of the producer or the distributor and how to contact them for further information
- How to use the product (feeding instructions)
- Weight and/or quantity statement

This section provides more detail for each of these areas to help you understand what information is provided

3. Name and Product Description

Most usually for pet food, this will be in the form of

“A complete pet food for X” or

“A complementary pet food for X”.

However, the words complete and complementary can be replaced by “compound”, except for cat and dog food

The X will state the species (e.g. cat or dog), and possibly the particular life stage of the animal for example, "complete food for adult dogs".

What do complete and complementary mean?

Complete means that the pet food provides all the nutrients your pet requires each day, when fed as instructed.

Complementary means that the food is either intended to be mixed with something else (e.g. a wet food mixed with a mixer biscuit); or it could be intended as a snack or treat for your pet, either to help maintain his well-being e.g. oral care treats, or as part of your daily interaction with your pet.

4. Product variety for consumer choice

4.1 What types of product varieties exist?

You will be familiar with the fact that manufacturers offer different varieties for your pets. These varieties can refer to the inclusion of specific ingredients but also to certain animal species or the meat content (e.g. "with carrots"; "with chicken"; "with fish"; "rich in beef").

But what do these terms really mean?

Manufacturers often use a range of animal materials in their products to ensure that pets always receive the correct nutrition [see also the section on "Why use categories" / "What are meat and animal derivatives" below].

So when the variety mentions an animal species or the meat content, this refers to certain parts of the animal materials authorised for pet food.

4.2 What are the amounts of the claimed material are in the pet food?

If you see terms like "with"/"rich in" used on the label, the following amounts must be present, and in addition will be stated on the label:

"flavoured with X" = less than 4% X

"with X" = at least 4% X

"rich in X" = at least 14% X

"X dinner" = at least 26% X

- **Some ingredients, for example those with an intense flavour such as herbs, will necessarily be included at lower levels.**

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- **Indicated amounts can be based on rehydration as explained under 6.3.**

Example: a "with carrots" variety has to contain at least 4% fresh carrots or an equivalent amount of dried carrots.

5. What does it mean when it says “reduced fat” or “increased protein”?

For some pets, it might be beneficial for them to be provided with a diet that is slightly different from the “standard” range of products available. For example, a working dog like a sheepdog might require a higher level of protein.

The manufacturer is allowed to make this clear by putting a claim such as “increased protein” on the packaging. This means that the protein is at least 15% higher than in a “standard” product*.

Likewise, if the claim is “reduced”, it means that the level of the nutrient or material named is at least 15% lower than in a similar “standard” product*.

*If no explanation is given on pack, the reference is made to the standard adult product of the same range.

6. Composition (Ingredients List)

Pet food manufacturers follow two ways of declaring ingredients used in the recipe: Either by specific ingredients (e.g. dehydrated chicken protein, wheat, soybean meal, corn starch, chicken fat, etc...) or by category names as defined in EU legislation (e.g. meat and animal derivatives, vegetables, cereals, minerals, etc...).

For minerals, in order to avoid a long list of names, pet food manufacturers have agreed on the possibility to use the category name even for declaration by ingredients (e.g. “minerals” instead of “calcium carbonate, sodium chloride, potassium chloride, etc...”).

• 6.1. Why use categories?

In order to produce nutritious pet food that is affordable for everyone, the pet food industry uses materials from the human food chain that are surplus to requirements. This has the advantage of using materials that are highly nutritious but “unfashionable” in human food, depending on countries and cultural habits (e.g. lungs, stomach, tripe, liver, hearts, kidneys, etc ...).

It also means that these materials are fully utilized – if they were not put into pet food, they would have to be disposed of, impacting the environment.

6.2. What is meant with the category “Meat and Animal Derivatives”?

The definition of the category terms “meat and animal derivatives” is “all the fleshy parts of slaughtered warm-blooded land animals, fresh or preserved by appropriate treatment, and all products and derivatives of the processing of the carcass or parts of the carcass of warm-blooded land animals”.

In addition, all animal material used in pet food comes from animals passed as fit for human consumption.

The European Pet Food Industry considers as meat not only skeletal muscle but also other material such as: tripe, liver, hearts, kidneys, etc. which are highly nutritious for pets.

6.3. Drawing attention to the presence of an ingredient (feed material)

The legislation allows that the industry draws the attention to a specific ingredient that is added, by indicating the percentage of that ingredient on the label. However, feed materials are not always available in a fresh or frozen form but can also be used in a dried form (e.g. for better handling or seasonal availability).

In wet pet foods, as there is sufficient water in the product to restore these materials to their original moisture level, it is permitted to consider that this is how they were added to the product. Thus, you might see on a can or pouch product:

Composition: "feed material (a), feed material (b), feed material (c),
carrots (4%), feed material (d), feed material (e)"

or

"feed material (a), feed material (b), feed material (c), carrots (7.4 %
from dried carrots), feed material (d), feed material (e)"

In the first case, the carrots were fresh or frozen, in the second case they were dried carrots.

In a dry pet food, where there is not sufficient water available, you might get some information how the amount of dry ingredient relates to the fresh ingredient:

Composition: feed material (a), feed material (b), feed material (c), feed material (d),
dried carrots 2 %*, feed material (e)

* equivalent to 9.6 % of fresh carrots

7. Additives List

7.1 Why are there additives in pet food?

For pet food, ingredients are either considered feed materials (e.g. beef liver, carrots, hay, etc) or additives (e.g. Vitamin C, zinc, caramel, tocopherols (= Vitamin E), etc).

In the same way that additives are used in human food products to help provide texture or colour, for example, or to maintain the product quality, so they are used in pet food. In addition, vitamins, amino acids and trace elements - for example, iron - can also be added to ensure that the product is nutritionally complete for the pet. Many of the additives used in pet food are also used in human foods. Led by the authorities, there is a strict process in place to ensure that all additives are authorised, based upon animal safety.

This authorisation process will assess whether the additive in question represents a risk to animal health and whether it is effective for its intended purpose.

Companies are only permitted to use authorised additives and in general only use the smallest amount that will provide the intended effect.

7.2 How are additives labelled?

Additives are grouped by law into different categories and functional groups describing their purpose. For example the category "nutritional additives" has the functional groups of "trace elements", "vitamins" or "amino acids".

Manufacturers are required to label certain additives preceded by the word "Additives" followed by either the categories or functional groups of the additives used along with the name and/or identification number and the amount added. The functional groups "preservatives", "colorants" and "antioxidants" may be labelled as such.

Some substances such as vitamins, trace elements and amino acids, can also be declared under the "analytical constituents" section. (See "10 Analytical Information"). This can happen when special attention is drawn to the presence or when there is a claim about it on the label (e.g. with high level of Vitamin E). If they are declared under "analytical constituents", the amount labelled is the total amount of the substance present in the finished pet food at the end of shelf life.

The level under additives is the amount of the substance that was added to supplement the natural level in the pet food according recipe. The level under analytical constituents is the total amount of the nutrient analysed, so some will have come from the supplement added, and some will have come from the materials in the pet food.

For some nutrients (like vitamins) the amount will decrease over shelf life and therefore the amount labelled under analytical constituents is the amount at the end of shelf life.

If there is concern about a particular additive and it is not on the label (or if you want to know all additives in the product), manufacturers can be contacted for further information.

8. Analytical information

This list is headed by the word "Analytical constituents".

This is similar to the nutritional information that is found on human food packaging and includes for cat and dog food:

- (crude) protein
- fat content
- crude fibres
- crude ash.

For other pet food it is voluntary to label the analytical constituents.

There is a legal obligation to use certain words on the label like "crude" and "ash", originating from laboratory language.

"Ash" is not added to pet food, but is the residue from the analytical method and mainly represents minerals; the terms "incinerated residue" or "inorganic matter" are thus also permitted.

9. Best Before Date and Batch Code

This information allows manufacturers and enforcement authorities to identify batches of product if required in exactly the same way as in human food.

The Best Before Date tells you exactly that – when the product will be "best" before – it is not necessarily harmful if consumed after this date, but this is when nutrients like the vitamins will be guaranteed until.

10. How to contact the manufacturer for further information

You will find on the packaging the name and address of the manufacturer or distributor where you can enquire for further information. Additionally, there must be references to either a free telephone number, or a website or a dedicated consumer careline or other means by which you can contact the manufacturer/distributor.

11. How to use the product (feeding instructions)

On the label, you will find a guide on how much and how often to feed the product to your pet. It is important to follow these instructions to ensure that your animal receives all the essential nutrients and will not become obese.

If you have any questions, manufacturers will be happy to help you.

12. Weight statement/quantity

The weight statement on the pack is the same as that which you find upon human food. Sometimes the quantity is not indicated by weight, but by number of pieces (e.g. five pig's ears).

13. Other information

All the information outlined above has to be placed on the label by law. However, manufacturers are also permitted to include other information on a voluntary basis. The fact that it is voluntary does not mean that it should be any less accurate however.

You may also be familiar with claims appearing upon the label, relating to particular product benefits. By law this information must be able to be supported by the manufacturer. If you have any concerns regarding a claim that you see on a pack it is recommended that you contact the manufacturer in the first instance.

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