



**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

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FEDIAF represents the national pet food industry associations in the EU and from Norway and Switzerland and is the spokesman for approximately 130 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 2006/114 and 89/552

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.

Regulation 767/2009 provides for the establishment of a Code of Good Labelling Practice for Pet Food (hereafter referred to as "the Code") to improve the appropriateness of labelling and in particular to include provisions on voluntary labelling aspects and claims. This Code was first agreed and ratified by the European Commission in October 2011, at which time the Commission issued a press release including the following statement:

*"The purpose of the FEDIAF Pet Food Labelling Code established under the principles of co-regulation, is that it assures a harmonised approach: instead of having 27 different national interpretations of the labelling rules, the code gives clear guidance on how the provisions should be applied throughout the EU"* [European Commission press release 8 December 2011].

FEDIAF members experience demonstrates that it continues to 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. It should be noted that the examples provided within this Code are given for illustration purposes only; their use must depend on the circumstances, context and the manufacturer's ability to substantiate.

This Code will be reviewed once a year and updated when the need arises.

## 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 Standards; and
- (iv) Others as specified. Whenever appropriate, definitions are adapted to *pet food*.

<b>Animal by-products (for pet food production)</b>	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
<b>Analytical Variation</b>	Inherent variability in the degree of accuracy delivered by any defined and/or official method of analysis i.e. how reproducible the method is either within one lab or between different labs.	FEDIAF explanation
<b>Batch or lot</b>	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)
<b>“Bloggo”</b>	A hypothetical pet food brand name	
<b>Carrier</b>	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 itself	R. 767/2009, Art. 3.2 (m)
<b>Claim</b>	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
<b>Comparative advertising</b>	Any advertising which explicitly or by implication identifies a competitor or goods or services offered by a competitor.	D. 2006/114, Art. 2c
<b>Competent authority</b>	The authority of a Member State or of a third country designated to carry out official controls.	R. 183/2005, Art. 3.e
<b>Complete feed</b>	Compound feed which, by reason of its composition, is sufficient for a daily ration.	R. 767/2009, Art. 3.2 (i)
<b>Complementary feed</b>	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)
<b>Compound feed</b>	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)
<b>Compound (when referred to in the context of trace elements)</b>	A compound is a word used to describe a substance that delivers a trace element. For example, it is not possible in practice to add a trace element such as Zinc just as Zinc. For nutritional purposes, it needs to be added as a compound such as Zinc Sulphate.	FEDIAF explanation
<b>Consumer</b>	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)
<b>Contaminated material</b>	Feed containing a level of undesirable substances in excess of that tolerated under Directive 2002/32/EC.	R. 767/2009, Art. 3.2 (p)
<b>Customer</b>	One who buys goods or services, e.g. the trade partner. An organization or person who receives pet food.	ISO 9000

<b>Daily ration</b>	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. 1169/2011, Art. 18.1
<b>Dog chews</b>	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)
<b>Dry pet food</b>	Pet food with a moisture content of 14 % or less.	Longstanding industry definition
<b>Feed</b>	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
<b>Feed additives</b>	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"> <li>- favourably affect characteristics of feed;</li> <li>- favourably affect characteristics of animal products;</li> <li>- favourably affect the colour of ornamental fish and birds;</li> <li>- satisfy the nutritional needs of animals;</li> <li>- favourably affect the environmental consequences of animal production;</li> <li>- favourably affect animal production, performance or welfare, particularly by affecting the gastro-intestinal flora or digestibility of feedingstuffs;</li> <li>- have a coccidiostatic or histomonostatic effect.</li> </ul>	R. 1831/2003, Art. 2 (2)(a)
<b>Feed business</b>	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
<b>Feed business operator</b>	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)
<b>Feed hygiene</b>	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)
<b>Feed materials</b>	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)
<b>Feed intended for particular nutritional purposes In short "PARNUTs" or legally "dietetic" pet food</b>	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.	R. 767/2009, Art. 3.2 (o)
<b>Finished product</b>	Product that will undergo no further processing or transformation by the organisation.	EN ISO 22000:2005(E)
<b>GMO</b>	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.	D. 2001/18, Art. 2 (2)

	Organisms obtained through the techniques of genetic modification listed in Annex I B to Directive 2001/18 are excluded from the scope of definition.	R. 1829/2003
<b>Genetically modified feed (pet food)</b>	Feed containing, consisting of or produced from GMOs. For pet food products which are not required to be labelled "contains GMO plus name of the GM feed" or "produced from GMO plus name of the GM feed", the operator is required to ensure that the pet food product does not contain, consist of or is produced from GMO in excess of 0.9% per incorporated [ingredient] substance provided that this presence is adventitious (accidental, non-intentional) or technically unavoidable.	R. 1829/2003
<b>Hermetically sealed container</b>	A container that is designed and intended to be secure against the entry of micro-organisms, such as a can, tray, pouch etc.	R. 142/2011, Annex I (51)
<b>Label</b>	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)
<b>Labelling</b>	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)
<b>Lot</b>	See "batch" above	R. 767/2009, Art. 3.2 (r)
<b>Major component</b>	A <b>major component</b> 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.	Longstanding industry definition
<b>Meat</b>	Skeletal muscle.	R. 68/2013
<b>Medicated feed</b>	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> .	D. 2001/82, Art. 1(6) and (2)
<b>Milk replacer</b>	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)
<b>Mineral feed</b>	Complementary feed containing at least 40% crude ash.	R. 767/2009, Art. 3.2 (k)
<b>Minimum storage life</b>	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)
<b>Minor component</b>	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.	Longstanding industry definition
<b>Mixing bowl principle</b>	Feed materials declaration is based on the weight/percentage at the time of their use in the preparation of the pet food.	Adapted from Art. 18 (1) of R. 1169/2011

<b>Moist/wet pet food</b>	Pet food with a moisture content of 60 % or more.	Longstanding industry definition
<b>Multipack</b>	A group of individual units which are not intended to be sold individually.	Adapted from R. 767/2009, Art. 21 (7)
<b>Non-food producing animals</b>	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)
<b>Nutrition claim</b>	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
<b>Off-pack communication</b>	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)
<b>Oral feeding of animals</b>	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)
<b>PARNUT</b>	See under "Feed for Particular Nutritional Purposes"	R. 767/2009, Art. 3.2 (n) (o)
<b>Pet or pet animal</b>	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, wild or ornamental birds, rodents	R. 767/2009, Art. 3.2 (f)  Adapted from R. 998/2003, Annex I
<b>Pet food</b>	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)
<b>Pet food chain</b>	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)
<b>Pet food safety</b>	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)
<b>Placing on the market</b>	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
<b>Premixtures</b>	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)
<b>Pre-packaged pet food</b>	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,	Adapted from Art. 2 (2) (e) of R. 1169/2011

	but in any case in such a way that the contents cannot be altered without opening or changing the packaging.	
<b>Presentation</b>	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)
<b>Processing aids</b>	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. Feed materials shall be free from chemical impurities resulting from their manufacturing process and from processing aids, unless a specific maximum content is fixed in the Catalogue of Feed Materials. .	R. 1831/2003, Art. 2(2)(h)  R. 68/2013, Annex, Part A, point 4, and R. 767/2009, Annex I, point 1
<b>Raw pet food</b>	Means pet food which has not undergone any preserving process other than chilling or freezing.	R. 142/2011, Annex I (21)
<b>Semi-moist pet food</b>	Pet food with a moisture content between 14 % and 60 %.	Longstanding industry definition
<b>Shelf-life</b>	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.	Codex alimentarius hygienic practices for refrigerated foods with extended shelf-life CAC/RCP 46-(1999)
<b>Statutory information</b>	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
<b>Traceability</b>	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
<b>Undesirable substance</b>	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

<b>GENERAL REQUIREMENTS</b>	<b>LEGAL AND USEFUL DOCUMENTATION</b>
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#### 3.1 PURPOSE AND GENERAL PRINCIPLES OF A LABEL

*The label is the most important and most often used medium 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"> <li>+ The product label shall conform to all appropriate legislation.</li> <li>+ 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.  <b>Note:</b> 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</li> <li>+ All EU language versions of <a href="#">Regulation 767/2009</a> can be found on EURLex (in consolidated versions with latest amendments) as well as of the Catalogue of Feed Materials (the use of which is voluntary) <a href="#">Regulation 68/2013</a></li> <li>+ The vocabulary used should be easily understandable by the average purchaser.</li> <li>+ 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.</li> <li>+ Pet food shall not be described or presented on any label with words, pictorial or other means that are false or untruthful.</li> <li>+ Pet food labels shall not mislead, confuse, exaggerate or deceive either directly or indirectly or by implication.</li> <li>+ The label shall clearly indicate that it is intended for pets.</li> <li>+ Labelling must also provide the purchaser with directions on the proper use of the product, i.e. feeding instructions and storage instructions (if appropriate).</li> </ul>	<p>R. 767/2009, Art. 14.1</p>
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## 3.2 LEGAL REQUIREMENTS

### 3.2.1 Mandatory labelling requirements for pet food

*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 "materia prima per mangimi" may be replaced by "mangime semplice";
- in Czech the designation "krmiva" may be replaced by "produkty ke krmení" as applicable

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

##### B. For feed for pets, the following expressions shall be allowed:

- in Croatian "hrana za kućne ljubimce"
- in Dutch "samengesteld voeder";
- in English "pet food";
- in Estonian "lemmikloomatoit"
- 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".

**NOTES:** Manufacturers of pet food that does not contain components of animal origin but 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.

R. 999/2001 Annex IV, III D

Raw pet food must be labelled "pet food only".

R. 142/2011 Annex VIII, Chapter II, point 2 (b) (vii)

### 3.2.1.2 Animal species and/or category of animals

The species or category of animal for which the product is intended.	
<p>The target species or the category of animals shall be clearly identifiable. This may also include an indication of the life stage of the animal, if appropriate</p> <p><b>Examples:</b> + Bloggo compound pet food for hamsters + Bloggo complete feed for adult dogs + Bloggo complete pet food for dogs + Bloggo complete pet food for kittens + Bloggo compound feed for hamsters</p>	<p>R. 767/2009, Art. 17.1(a)</p> <p>R. 767/2009 Annex II, point 3b</p>

### 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.	
<ul style="list-style-type: none"> <li>The proper use may also require manufacturers to indicate the necessity to ensure fresh water is available at all times when feeding dry food.</li> <li>It is advisable to provide recommended storage conditions since climatic conditions may degrade the product quality. Consideration should be given to providing storage conditions for product once opened <ul style="list-style-type: none"> <li><b>Examples:</b> + in the case of wet pet food: serve at room temperature, refrigerate unused amount</li> <li>+ in the case of dry pet food: once opened, reseal &amp; store in a cool dry place</li> </ul> </li> <li>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.</li> <li>For pet food other than cat and dog food not labelled "complete" or "complementary" in accordance with Art. 15 (a) 3<sup>rd</sup> indent of Regulation 767/2009, the feeding instructions shall be adapted to the pet species for which the pet food is intended.</li> <li>The instructions of proper use for complementary feed and feed materials containing additives in excess of the maximum levels fixed for complete feed shall state the maximum quantity <ul style="list-style-type: none"> <li>- in grams or kilograms or units of volume of complementary feed and feed materials per animal per day or</li> <li>- percentage of daily ration or</li> <li>- per kilo of complete feed or percentage in complete feed</li> </ul> </li> </ul> <p>in order to ensure that respective maximum contents of feed additives in the daily ration are complied with.</p> <ul style="list-style-type: none"> <li>Manufacturers should consider when providing feeding guides the appropriateness of the instructions for all animals that may be covered by a animal group name such as "ornamental fish".</li> </ul> <p><b>Note:</b> The labelling of pet rabbit food and koi food as pet food is accepted if the product is clearly labelled as destined for non-food producing animals (by pictures, other visuals and words) and if the packaging does not exceed 10 kg.</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

<p><b>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.</b></p>	
<p><b>The heading "Composition" shall appear before the list of feed materials and categories</b></p> <p><b>A. By specific names</b>  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.  When feed materials are used in concentrated or dehydrated form they shall be listed in order of weight in their concentrated or dehydrated form. The feed material incorporated in a dehydrated or concentrated form must be stated; the terms "dried", "powder", "meal" or similar terms are permitted when it clearly indicates that the component was dehydrated or concentrated e.g. the description used should give a clear indication as to the process/state of the dehydrated or concentrated material.</p> <p><b>Examples:</b></p> <ul style="list-style-type: none"> <li>+ Tomato powder</li> <li>+ Dried apple flakes</li> <li>+ Chicken liver powder</li> </ul> <p>See Annex V for further examples and explanations</p> <p>The name of a feed material used in the Composition list may be a consumer friendly term for the technical descriptive term used in the <a href="#">Catalogue</a> or <a href="#">Register</a> of feed materials. It shall suitably describe the feed material without misleading the purchaser.  N.B.  (1) 3.2.1.1  It is not mandatory to only use terms included in the Catalogue of feed materials.  (2) Please be aware that the Feed Material Catalogue is available in all official EU languages on EURLex: <a href="#">Regulation 68/2013</a>. It might be a useful reference guide for multi-language labels.</p> <p>If the name of a feed material listed in the Catalogue of feed materials is used, it 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"> <li>• comply with the description/specifications in the Catalogue</li> <li>• respect the production process if included in the feed material's name in accordance with the Catalogue's glossary</li> <li>• if appropriate add a qualifier (e.g. hydrolysed chicken protein)</li> </ul> <p>The name/labelling and the presentation of the feed shall not mislead the purchaser as to the compliance of the labelling with the Catalogue of Feed Materials.</p> <p><b>B. By categories</b>  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.  <b>Example:</b> meat and animal derivatives</p> <p><b><u>See Annex 1 : The categories of feed materials</u></b>  <b>Declaration</b></p>	<p>R. 767/2009, Art 17.1(e)</p> <p>R. 767/2009, Art.17.1(e)  R. 767/2009, Art. 16.1(a) &amp; Art. 24.5</p> <p>R. 767/2009, Art. 24.5</p> <p>R. 767/2009, Art. 17.2(c)  R. 68/2013</p> <p>R. 767/2009, Art. 24.5.</p> <p>D. 82/475</p>

<p>Use of one of these two forms of declaration should for consistent best practice exclude use of the other except</p> <ul style="list-style-type: none"> <li>• where particular attention is drawn to particular feed materials or</li> <li>• where a feed material does not belong to any of the categories which have been defined;</li> </ul> <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.</p> <p><b>Examples:</b> dried parsley 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><b>C. Particular attention</b></p> <p>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</p> <p><b>Example:</b> When “liver” or a variety e.g. “beef” 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 (a).</p>
<p><b>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.</b></p>	
<p>The treatment may be included.</p> <p><b>Examples:</b></p> <ul style="list-style-type: none"> <li>+ Feed material: Pig ears</li> <li>+ Feed material: Dried pork hide</li> <li>+ Feed material: Beef livers (frozen)</li> <li>+ Millet spray for ornamental birds</li> </ul> <p>In the case of feed materials, the following indications must be labelled:</p> <ul style="list-style-type: none"> <li>• The term “feed material” and its name considering the Catalogue of feed materials (if listed therein)</li> <li>• The name or business name and the address of the responsible for the labelling</li> <li>• The approval number (see chapter 3.2.1.10)</li> <li>• The batch or lot reference number (see chapter 3.2.1.10)</li> <li>• The net quantity, if appropriate (see chapter 3.2.1.11)</li> <li>• The list of additives (see chapter 3.2.1.5)</li> <li>• The minimum storage life for additives (other than technological) incorporated</li> <li>• The compulsory declaration must at least be labelled according to annex V of Regulation 767/2009 or in accordance with the particulars laid down in the Catalogue of Feed Materials, the Annex, Part C, the column “Compulsory declaration”.</li> </ul>	<p>R. 767/2009, Art 15, 16</p>

### 3.2.1.5 Additives

<p><b>Additives with a legal maximum level for any non-food producing species have to be declared on pet food labels when they are added. Any other additives not having a legal maximum can be declared voluntarily when added.</b></p>	
<p>Only authorized additives for the relevant (or all) species are allowed to be used.</p>	

[N.B. Additives are currently going through the European Commission reauthorisation process (which includes EFSA risk assessment). This must be considered when they are used for labelling and when establishing functional groups.]

R. 767/2009, Annex VII.I.

## A. What has to be declared

### 1. Mandatory declarations

- Additives where a maximum limit is set for at least one non-food producing animal. E.g. an additive permitted for use in cat food, without legal limit, still has to be declared if a maximum level was set for another pet or a fur animal. ([see Annex 9](#))
- Note on Vitamin A:  
Vitamin A has a legal maximum only for milk replacers without mentioning an animal species. Vitamin A must therefore be labelled on milk replacers intended for pet animal. It is recommended to label vitamin A on other pet food intended to young animals before weaning. For other pet food, as there is no legal maximum, vitamin A labelling is not mandatory.
- Additives belonging to the categories
  - Zootechnical additives
  - Coccidiostats and histomonostats
- Additives for which the recommended maximum contents set for the target species are exceeded
- Any other additive if its presence is emphasized on the label whether in words, pictures or graphics.

Annex VII.I.1a

Annex VII.I.1b

Annex VII.I.1c

Annex VII.I.4

Labelling specificities for vitamins, pro-vitamins and chemically well-defined substances having a similar effect with processing losses

- Some additives, e.g. vitamins, may be declared under the heading "Additives" with a value higher than the legal maximum laid down in the legislation, when processing losses require higher levels to be added in order that nutritional standards are maintained in the finished product. In this case, manufacturers must be able to substantiate that the finished product complies with the legal maximum when put on the market.  
Vitamins, pro-vitamins and chemically well-defined substances having a similar effect may be labelled under the heading "Analytical constituents" with the amount guaranteed until the end of the products' shelf life instead under "Additives".

Annex VII.I.2

Annex VII.I. Last section

Labelling specificities for additives which are indicated in the "minimum/maximum content" column of their respective authorization Regulation (e.g. some trace elements):

The declared amount of such additives is the added amount of the substance indicated in the "minimum/maximum" column, i.e. for trace elements the amount of the element, not the amount of the compound. If no substance name is indicated in the "minimum/maximum" column then the added amount of the compound should be indicated.

### 2. Voluntary declarations

- All other additives
- See also section 3.2.1.6 (Analytical constituents)

## B. How additives have to be declared

### 1. Mandatory declarations

Additives shall always be declared with the other statutory information.

**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 and their permitted abbreviations**)
- The name and/or number as specified in the legislation authorising the additive.
- For vitamins, it is possible to use the consumer-friendly name e.g. Vitamin A, Vitamin E, Vitamin B<sub>6</sub>, rather than the full chemical name and/or number.
- The added amount of the additive [see Part A above]. It is the responsibility of manufacturers to determine the appropriate units for the amount (for example mg/kg, mg/l, IU/kg as laid down in the authorization act).

#### Examples:

**"Trace elements" or "Nutritional additives" followed by for example:**

Example 1: Added amount of zinc sulphate heptahydrate is 500 mg/kg corresponding to 110 mg/kg of the element Zinc.

- + 3b604/zinc sulphate heptahydrate, zinc: 110 mg/kg
- + 3b604/Zinc, 110 mg/kg,
- + Zinc (Zinc sulphate heptahydrate): 110 mg/kg
- + Zn (Zinc sulphate heptahydrate): 110 mg/kg
- + Zinc sulphate heptahydrate (Zinc: 110 mg/kg)
- + Zinc sulphate heptahydrate (Zn: 110 mg/kg)
- + 3b604 (Zinc: 110 mg/kg)
- + 3b604 (Zn: 110 mg/kg)
- + Zinc sulphate heptahydrate: 500 mg/kg (Zinc: 110 mg/kg)
- + Zinc sulphate heptahydrate: 500 mg/kg (Zn: 110 mg/kg)
- + 3b604: 500 mg/kg (Zinc: 110 mg/kg)
- + 3b604: 500 mg/kg (Zn: 110 mg/kg)

Example 2: Labelling of trace element when added in several forms

- + Copper chelate of hydroxy analogue of methionine; copper chelate of glycine, hydrate: copper 30 mg/kg
- + E4/copper 30mg/kg (copper chelate of glycine, hydrate; 3b4.10)
- + Copper 30mg/kg (copper chelate of glycine, hydrate; 3b4.10)
- + Cu 30mg/kg (copper chelate of glycine, hydrate; 3b4.10)

**"Vitamins" or "Nutritional additives" followed by for example:**

- + Vitamin D<sub>3</sub> 1000 IU/kg,
- + 3a671/Vitamin D<sub>3</sub> 1000 IU/kg
- + 3a671 1000 IU/kg
- + 3a671/Vitamin D<sub>3</sub> 1000 IU/kg
- + Cholecalciferol 1000 IU/kg

R. 767/2009, Art. 15 (f)

R. 767/2009, Art. 15 (f)

Annex VII. I. 1

- + 3a671/Cholecalciferol 1000 IU/kg
- + Vitamin D3/Cholecalciferol 1000 IU/kg

Vitamin declaration can be applied using the term "Vitamin" and the amount added should be expressed in the unit used in the authorization act with the use of conversion factors therein. If no unit is specified, manufacturers should select the most appropriate unit.

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

Multiple languages can be combined ([see example Annex 9](#))

*Derogation for pet food*

- Additives of the functional groups "preservatives", "antioxidants", "flavourings" and "colourants" with a maximum legal level or which exceed the recommended maximum level can optionally be declared by only the respective functional group.
- If the derogation is used, the person responsible for the labelling shall disclose to the purchaser, upon request, the name and/or identification number, added amount and functional group of the additive (see section on information of the purchaser on composition 3.2.1.19).

**2. Voluntary Declarations**

- If an additive is declared voluntarily under the additives heading at least their name shall be indicated, for flavouring compounds at least the functional group.
- Voluntary labelling of sensory or nutritional additives triggers all mandatory labelling requirements.

**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.

Where an additive is declared both under additives and analytical constituents, it is possible that two different values will be declared – the added value in the list of additives and the total value at the end of shelf-life under analytical constituents.

Legislation requires the added amounts of additives to be labelled. Due to production losses, selection of feed materials and shelf life losses, in some cases the analysed amount is unlikely to correspond to the amount labelled in the Additive section. It is recalled that recipe documentation on the amount added must be made available to control authorities on their request.

Annex VII.I.5

Annex VII.I.7

Annex VII.I.9

Annex VII. II, 2

<p>Sensory or nutritional additives, if also labelled under “Analytical constituents” must be declared with their total amount at the end of shelf life.</p>	<p>R. 767/2009, Art 8.1</p>
<p><b>C. Specificities for Complementary Feed</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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. If not approved as a PARNUT, the product may only be marketed as a premixture, not as a complementary pet food.</li> </ul>	<p>R. 767/2009, Art 8.2</p>

### 3.2.1.6 Analytical constituents

<p><b>The mandatory declaration of analytical constituents is related to the type of feed and/or the target animal species.</b></p>														
<p><b>The heading “Analytical constituents” shall appear before the list of the analytical constituents.</b></p>	<p>R. 767/2009, Annex VII.II.1</p>													
<p><b>A. Moisture content</b> must be stated if it exceeds:</p> <ul style="list-style-type: none"> <li>• 7 % in case of milk replacer feeds and other compound feed with a milk product content exceeding 40 %,</li> <li>• 5 % in the case of mineral feed containing no organic substances,</li> <li>• 10 % in the case of mineral feed containing organic substances,</li> <li>• 14 % in the case of other feed.</li> </ul> <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>R. 767/2009, Art. 15 (g) &amp; Annex I.6</p>													
<p><b>B. Ash insoluble in hydrochloric acid</b> must be labelled when exceeding 2.2% of dry matter.</p>	<p>R. 767/2009, Art 4(3) &amp; Annex I.5</p>													
<p><b>C. Other Analytical constituents in compound feed:</b> N.B. It is recommended to check R. 767/2009 in the local language for correct designations of analytical constituents.</p>	<p>R. 767/2009, Annex VII.II.1</p>													
<table border="1"> <thead> <tr> <th data-bbox="207 1549 505 1608">Type of Feed</th> <th data-bbox="505 1549 1019 1608">Analytical constituents and levels</th> <th data-bbox="1019 1549 1166 1608">Target species</th> </tr> </thead> <tbody> <tr> <td data-bbox="207 1608 505 1772">Complete feed</td> <td data-bbox="505 1608 1019 1772"> <ul style="list-style-type: none"> <li>- <b>Crude Protein</b> or <b>Protein</b></li> <li>- <b>Crude fibre</b></li> <li>- <b>Crude fat</b> or <b>Fat content</b></li> <li>- <b>Crude ash</b> or <b>Incinerated residue</b> or <b>Inorganic matter</b></li> </ul> </td> <td data-bbox="1019 1608 1166 1772"> <p>Cats, dogs Cats, dogs Cats, dogs</p> </td> </tr> <tr> <td data-bbox="207 1772 505 1871">Complementary feed – Mineral</td> <td data-bbox="505 1772 1019 1871"> <ul style="list-style-type: none"> <li>- <b>Calcium</b></li> <li>- <b>Sodium</b></li> <li>- <b>Phosphorus</b></li> </ul> </td> <td data-bbox="1019 1772 1166 1871"> <p>All species All species All species</p> </td> </tr> <tr> <td data-bbox="207 1871 505 1938">Complementary feed – Other</td> <td data-bbox="505 1871 1019 1938"> <ul style="list-style-type: none"> <li>- <b>Crude Protein</b> or <b>Protein</b></li> <li>- <b>Crude fibre</b></li> </ul> </td> <td data-bbox="1019 1871 1166 1938"> <p>Cats, dogs Cats, dogs</p> </td> </tr> </tbody> </table>	Type of Feed	Analytical constituents and levels	Target species	Complete feed	<ul style="list-style-type: none"> <li>- <b>Crude Protein</b> or <b>Protein</b></li> <li>- <b>Crude fibre</b></li> <li>- <b>Crude fat</b> or <b>Fat content</b></li> <li>- <b>Crude ash</b> or <b>Incinerated residue</b> or <b>Inorganic matter</b></li> </ul>	<p>Cats, dogs Cats, dogs Cats, dogs</p>	Complementary feed – Mineral	<ul style="list-style-type: none"> <li>- <b>Calcium</b></li> <li>- <b>Sodium</b></li> <li>- <b>Phosphorus</b></li> </ul>	<p>All species All species All species</p>	Complementary feed – Other	<ul style="list-style-type: none"> <li>- <b>Crude Protein</b> or <b>Protein</b></li> <li>- <b>Crude fibre</b></li> </ul>	<p>Cats, dogs Cats, dogs</p>	<p>R. 767/2009, Annex II.5 (The synonyms)</p>	
Type of Feed	Analytical constituents and levels	Target species												
Complete feed	<ul style="list-style-type: none"> <li>- <b>Crude Protein</b> or <b>Protein</b></li> <li>- <b>Crude fibre</b></li> <li>- <b>Crude fat</b> or <b>Fat content</b></li> <li>- <b>Crude ash</b> or <b>Incinerated residue</b> or <b>Inorganic matter</b></li> </ul>	<p>Cats, dogs Cats, dogs Cats, dogs</p>												
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<ul style="list-style-type: none"> <li>- <b>Crude fat</b> or <b>Fat content</b></li> <li>- <b>Crude ash</b> or <b>Incinerated residue</b></li> <li>or <b>Inorganic matter</b></li> </ul>	<p>Cats, dogs</p> <p>Cats, dogs</p>	
<p><b>For complete or complementary feed for pet animals other than cats and dogs analytical constituents may be labelled voluntarily.</b></p> <p><b>N.B.</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>Nutritional and sensory additives can also be declared under the heading "analytical constituents" with the total amount, for vitamins, pro-vitamins and chemically well-defined substances having a similar effect with the amount guaranteed at the end of the shelf life</p> <p>In German language 'analytische Bestandteile' may be replaced by 'Inhaltsstoffe'. In Swedish language 'Analytiska beståndsdelar' may be replaced by 'Analyserat innehåll'.</p>		<p>R. 767/2009, Annex VII.II.3</p> <p>R. 767/2009, Annex VII.I.2 and II.2</p> <p>R. 767/2009, Annex VII, footnote (1)</p>

### 3.2.1.7 Tolerances

<p><b>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.</b></p>		
<ul style="list-style-type: none"> <li>• The tolerances laid down in Annex 2 of this Code include technical and analytical deviations <ul style="list-style-type: none"> <li>- Unavoidable variations - from batch to batch <ul style="list-style-type: none"> <li>- in the raw materials</li> <li>- in the production processes</li> </ul> </li> <li>- Analytical variation</li> </ul> </li> <li>• 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.</li> <li>• It should be considered that the labelled amount of additives will not always be in line with the analysed results for various reasons including: <ul style="list-style-type: none"> <li>○ content of substances naturally present in feed materials,</li> <li>○ Declining amounts during processing and shelf-life (e.g. vitamins, antioxidants....),</li> </ul> </li> </ul> <p>Tolerances are not intended to allow deficiencies or excesses of the guaranteed level.</p> <p><b>See Annex 2</b></p>		<p>R. 767/2009, Art. 11.5 &amp; Annex IV</p>

### 3.2.1.8 Energy and protein declaration

<p><b>The energy and protein values may be declared.</b></p>		
<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 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.</p>		<p>R. 767/2009, Annex VII.II.3</p> <p><a href="#">FEDIAF Nutritional Guidelines Cats and Dogs</a></p>



<p>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.</p> <p>In all cases it is advised to add the ISO abbreviations/number for the producing country (e.g. NL for the Netherlands, or 208 for Denmark) as a prefix to the approval number.</p> <p>2. When the person responsible for labelling is NOT the producer</p> <ol style="list-style-type: none"> <li>i. the name or business name and address of the producer must be labelled OR,</li> <li>ii. the approval number of the producer as referred to under B1. If no number is available an identifying number attributed to the producers' or on the importing feed business operators' request will be provided by the competent authority.</li> </ol> <p>3. The <b>Establishment Approval Number</b> 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</p> <p style="padding-left: 40px;"><b>Example:</b> For approval number: see top of the can.</p> <p>If no approval, registration or identification number has been assigned to a production plant, the name and the production address of the plant shall be indicated.</p>	<p>R. 767/2009, Art 17.1 (c)</p> <p>R. 767/2009, Art. 21.2</p>
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### 3.2.1.11 Net quantities

<b>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.</b>	
<ul style="list-style-type: none"> <li>• The expressions "net weight" or "net volume" before the numeric indications are not compulsory.</li> </ul> <p><b>Example:</b> 420 g or net weight: 420 g.</p> <ul style="list-style-type: none"> <li>• The character dimension in accordance with weights and net volumes must be as follows: <ul style="list-style-type: none"> <li>○ 6 mm if the net quantity is greater than 1000 g or 1000 ml</li> <li>○ 4 mm if it is between 1000 g or 1000 ml and 200 g or 200 ml excluded;</li> <li>○ 3 mm if it is between 200 g or 200 ml and 50 g or 50 ml excluded;</li> <li>○ 2 mm if it is equal to or less than 50 g or 50 ml.</li> </ul> </li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>Example:</b> 5 pig ears</p>	<p>R. 767/2009, Art. 15 (e)</p> <p>D. 76/211, Annex I 3.1</p> <p>R. 767/2009, Art. 21. 2</p> <p>D. 76/211, Art 4.2</p>



<p>D. for non-pre-packaged products offered to the final consumer the words 'This product contains genetically modified organisms' or 'This product contains genetically modified [name of organism(s)]' shall appear on, or in connection with, the display of the product.</p> <p><b>Tolerances</b> Tolerances have been established under which there is no obligation to indicate the presence of GMOs on the labels. 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. The tolerances that should be applied to each single feed material are the following:</p> <p>No higher than 0.9 % for the GMOs authorized in the EU</p> <p><b>N.B.</b> Claims such as "free from GMOs" shall not be made (see 5.2.2.2) <b>See Annex 3</b></p>	<p>R. 1830/2003, Art 4 (6)</p>
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### 3.2.1.14 Feed for Particular Nutritional Purpose/PARNUTs/Dietetic pet food

<b>For dietetic pet food the following additional indications must appear with the statutory indications on the packaging, on the container or on the label of the feed.</b>	
<ul style="list-style-type: none"> <li>• The product description (see section 3.2.1.1)</li> <li>• the qualifying expression "dietetic" together with the type of feed, i.e. 'complete feed' or 'complementary feed', as appropriate;</li> <li>• the precise use, by indicating the particular nutritional purpose (or <b>PARNUT</b>) as defined in part B column 1 of Directive 2008/38,</li> <li>• the indication of the essential characteristics of the feed; when the particular nutritional purpose can be achieved by several nutritional characteristics (denoted by 'and/or') foreseen in part B column 2 of Directive 2008/38, one or all of the listed nutritional characteristics can be indicated,</li> <li>• the declarations prescribed in column 4 in the annex concerning the PARNUT by indicating the precise term of the substance; 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,</li> <li>• If a substance 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,</li> <li>• Analytical constituents required in column 4 in the annex Part B concerning the PARNUT must be quantitative,</li> <li>• 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.</li> </ul> <p><u>Moreover:</u></p> <ul style="list-style-type: none"> <li>• the label or the directions for use of the feed for particular nutritional purposes must bear the indication that it is recommended that a nutrition expert or veterinarian's opinion be sought before use, complemented by or before extending the period of use as appropriate. The particulars in the annex of D. 2008/38 may stipulate that this declaration may be omitted;</li> </ul>	<p>R. 767/2009, Art. 15 a &amp; Art. 18 a</p> <p>D. 2008/38, Annex, B, column 1</p> <p>D. 2008/38, Annex, A.1 and 2</p> <p>D. 2008/38, Annex, A.1 and 8</p> <p>D. 2008/38, Annex, A.4</p> <p>D. 2008/38, Annex, A.5</p> <p>D. 2008/38, Annex, A.6 and 7</p> <p>D. 2008/38, Annex, B, column 5</p> <p>R. 767/2009, Art 18 c</p> <p>D. 2008/38/EC, Annex, Part A (3) &amp; R. 767/2009, Art.</p>

<ul style="list-style-type: none"> <li>the labelling of the feed for particular nutritional purposes may also highlight the presence or the low level of one or more analytical constituents or additives 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 or in the list of additives as appropriate.</li> </ul> <p><b>Examples:</b> + sodium: 0.5% + for support of liver function in case of chronic liver insufficiency</p> <ul style="list-style-type: none"> <li>the qualifying expression "dietetic" shall be reserved solely for feed for particular nutritional purposes. Qualifying expressions other than "dietetic" shall be prohibited in the labelling and presentation of these feeds;</li> <li>notwithstanding the provisions of Article 17.2 c (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.</li> </ul> <p><b>Examples:</b> + meat and animal derivatives (chicken: source of protein) + for support of liver function in case of chronic liver insufficiency</p>	<p>13 (1) &amp; 13 (3) (b) (Concerning claims) R. 767/2009, Annex VII.I.3</p> <p>R. 767/2009, Art. 18 (a)</p>
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### 3.2.1.15 Organic pet food

**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)**

**The EU organic production logo may not be used in the labelling, presentation or advertising of pet food.**

**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).**

### 3.2.1.16 Products sold in multipacks

**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.**

Nevertheless, the packs contained in the multipack will need to be labelled at least with:

- 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

R. 767/2009, Art. 21.7

R. 767/2009, Art. 15 (a) &  
Art. 17.1(a)  
Art. 15 (d)  
Art. 17.1(d)  
Art. 15 (e)

The outer pack shall include all mandatory declarations and should include an indication that the single containers cannot be sold separately.

### 3.2.1.17 Free Samples

<p><b>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.</b></p>	
<p><b>Labelling information</b></p> <ul style="list-style-type: none"> <li>• Product samples should therefore be fully labelled (see annex for the standard information to provide and below).</li> <li>• In addition, where required by local legislation the statement “Free Sample – not for sale” or equivalent should appear prominently in order to comply with local legislation. This does not apply to free products or gifts.</li> <li>• 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.</li> </ul>	<p>R. 767/2009, Art. 4.2 (b)</p>
<p><b>Availability of information</b></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 information is supplied to purchasers by other means.</p> <p>The labelling information must appear either:</p> <ul style="list-style-type: none"> <li>- on the product packaging itself; <b>or</b></li> <li>- on a label attached to the packaging, <b>or</b></li> <li>- in some other written form which the purchaser can retain - e.g. a sticker/leaflet.</li> </ul> <p>It is recommended that, in addition to one of the above options, the following information should be provided on individual packs as a minimum:</p> <ul style="list-style-type: none"> <li>- The type of feed</li> <li>- – The species or category of animal</li> <li>- – The batch or lot reference number</li> <li>- – The minimum storage life</li> <li>- – The net quantity</li> <li>- – Storage conditions if specific or appropriate</li> </ul>	

### 3.2.1.18 Chews

<p>Due to their origin and edible nature, these products must be labelled 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 (see chapter 3.2.1.4). 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"> <li>• entertain the pet <b>Example:</b> + edible product for the pleasure of chewing with no significant calorie contribution</li> <li>• achieve/perform mechanical actions <b>Example:</b> + to clean teeth, to file rodent teeth...</li> <li>• transfer/transmit/... beneficial/useful substances <b>Example:</b> + for fresh breath</li> </ul>	

### 3.2.1.19 Information for the purchaser on composition

<b>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.</b>	
<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"><li>• 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,</li><li>• the feed materials incorporated that are designated by category.</li></ul>	R. 767/2009, Art. 19 (a) & (b), Annex VII, I, 6

### 3.2.1.20 Legibility

<b>The person responsible for the labelling particulars must ensure the visibility and legibility of information of the label at the point of sale.</b>	
<p>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.</p> <p>To improve legibility, any label innovation including but not limited to "peelable/re-stickable" labels (which must be fixed at one end of the packaging) are possible as long as the following information is <b>visible at first glance</b>:</p> <ul style="list-style-type: none"><li>- brand</li><li>- type of feed</li><li>- species or category of animal</li><li>- net quantity</li><li>- batch n° / best before date</li><li>- pictorial indicating to purchasers how to have access to all other mandatory information available when opening the re-stickable label.</li></ul> <p><u>See Annex 7</u></p>	R. 767/2009, Art. 14. 1

### 3.2.1.21 Bulk Management

<p>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.</p> <p>Where feed materials or compound feed are sold in quantities up to 20 kg and the full labelling particulars are displayed at the point of sale, the following information shall be provided for the purchaser at latest on or with the invoice: For feed materials: The type of feed, the name of the feed material and the compulsory declaration in Annex V of R. 767/2009. For compound feed: The type of feed, the species or category of species for which the feed is destined, instructions for proper use.</p>	<p>R. 767/2009, Art. 11.2</p> <p>R. 767/2009, Art. 21.6</p>

### 3.2.1.22 Sales by means of distance communication (e.g. internet)

<p>Where feed is offered for sale by means of distance communication as defined in Article 6 of Directive 2011/83 the mandatory labelling particulars required by this</p>	R. 767/2009, Art. 11.3

<p>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.</p> <p>The exceptions are related to:</p> <ul style="list-style-type: none"> <li>- the name or business name and address (Art. 15 (b))</li> <li>- the batch number (Art. 15 (d))</li> <li>- the net quantity (Art. 15 (e))</li> <li>- the minimum storage life for additives or feed (Art. 16 2(c) or Art. 17 1 (d)).</li> </ul> <p>Nevertheless, these particulars shall be provided at the latest at the time of delivery of the feed along with all mandatory labelling particulars.</p>	
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### 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"

<p><b>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.</b></p>	
<p>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).</p> <p>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.</p> <p><b>See Annex 8</b></p>	<p>D. 76/211, Annex 1 - § 3.3</p> <p>D. 71/316, section 3 - Annex II</p>

#### 3.2.2.2 Pet food intended for export to third countries

<p>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.</p>	

#### 3.2.2.3 Environmental labelling

<p>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).</p>	

### 3.3 VOLUNTARY INFORMATION

<b>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.</b>	
For voluntary declaration of additives see section 3.2.1.5. For other voluntary information such as claims, icons, logos, pictorials, product shots, the general principles, as laid down in point 5.1, must apply.	R. 767/2009, Annex VII, I.5 R 767/2009, Art. 22

### 3.4 EXAMPLE OF A PET FOOD LABEL REVIEW CHECK-LIST

<b>A pet food label review check-list is provided to help the marketer to ensure conformity/compliance of the labels placed on products.</b>	
This example is only for guidance and is not exhaustive. In order to correctly complete this check-list, as a minimum the documentation referred to the annex 4 is necessary: <b>Note:</b> products intended for third countries need to comply with the relevant local legislation. <b><u>See Annex 4</u></b>	

## 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, including the internet. 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"><li>• the presentation of pet food should make clear it is intended only for pets and not create confusion with human food, or farm feed,</li><li>• 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).</li></ul>	
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#### 4.1.2 Claims and "labelling particulars" in the off-pack communication

<ul style="list-style-type: none"><li>• Where feed is offered for sale by means of distance communication (please refer to chapter 3.2.1.22,</li><li>• 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.</li></ul>	R. 767/2009, Art. 11.3 D. 2011/83, Art. 6
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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>

## 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 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 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.
- Pets and/or people should not be depicted in situations that could pose a risk to the health and well-being of either.

D. 2006/114

## 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 at the time of putting on the market; 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. The claim shall be objective, verifiable to the competent authorities and understandable by the user of the pet food.**

<p>The information shall not mislead the user</p> <ul style="list-style-type: none"> <li>• as to the intended use or characteristics of the feed, in particular, the nature, method of manufacture or production, properties,</li> <li>• 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,</li> <li>• 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,</li> <li>• by claiming that it will prevent, treat or cure a disease,</li> <li>• by claiming that it has particular nutritional purpose (PARNUT), but is not included in the list of PARNUTS in accordance with Article 10 of R. 767/2009 (dietetic pet food),</li> <li>• by using colours, fonts and size obscuring or emphasizing the legal requirements unless the aim is to draw attention to precautionary statements.</li> </ul>	<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)</p> <p>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 substance such as a feed material, additive, nutrient, flavour, characteristic, variety or other, in wording or by means of pictorial representation.**

**When a content claim is made, declaration of the amount of the claimed substance is required on the labelling under composition, additives or analytical constituents.**

##### 5.2.1.1 Component claims - major components

<p>Component claims refer to the presence of a particular feed material or particular characteristic which can be accompanied by a qualifier</p> <p style="padding-left: 40px;"><b>Examples:</b> + Bloggo with beef, or, Bloggo with fresh beef + Bloggo rich in liver + Bloggo with carrots and rice</p> <p><b><u>See Annex 5 for further information on inclusion levels and labelling requirements</u></b></p> <ul style="list-style-type: none"> <li>• A claim may be made relating to the presence of a single animal protein source e.g. a product made with only chicken protein included and no other animal proteins. This does not preclude the presence of protein from vegetable sources. The claim must be justifiable and substantiated as mentioned above.</li> </ul>	<p>R. 767/2009, Art. 17 (2) (a)</p>
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### 5.2.1.2 Component claims - minor components

<p>Component claim may refer to the presence of a particular minor component :</p> <p><b>Examples:</b> + Bloggo with parsley + Bloggo with spirulina</p> <p><b><u>See Annex 5 for further information on inclusion levels and labelling requirements</u></b></p>	<p>R. 767/2009, Art. 17 (2) (a)</p>
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### 5.2.1.3 Nutrient and additive claims

<p>Nutrient &amp; 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><b>Examples:</b> + Bloggo contains vitamin E + Enriched with Omega 3 fatty acids</p> <p><u>In the list additives, the added amount must be labelled, in the analytical constituents the total amount of nutrients must, for additives can be, labelled.</u></p> <p><b><u>See Annex 5 for further information on inclusion levels and labelling requirements</u></b></p>	
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### 5.2.1.4 High & low claims

<p>"High" and "low" claims are absolute and claimed levels need to be labelled and substantiated.</p> <p><b>Example:</b> + "high in omega 3 for working dogs"</p>	
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## 5.2.2 Negative claims or claims on the absence of a feed material or other substance

**This type of claim highlights that a particular substance such as a feed material, additive, or other has not been added intentionally to the product recipe and/or is absent from the finished product.**

### 5.2.2.1 Use of the terms "No/No added...\*", "without/without added...\*", "formulated without", "made without". \*Whichever is most linguistically appropriate and meets the conditions below

<p>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.</p> <p><b>Example:</b> + "made without wheat" where no wheat is added to the recipe or via vitamin premixtures, but very small traces may occur from the cross contamination of feed materials, additives or production lines.</p> <p>Negative claims or claims on absence should not directly, indirectly or implicitly</p> <ul style="list-style-type: none"> <li>• be used if all similar goods in the same category or class or all pet food do not contain the substance in question,</li> <li>• give the impression that products containing that particular substance/feature are dangerous.</li> </ul>	<p>R. 767/2009 Art 11.1 (b)</p>
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### 5.2.2.2 Use of the term "Free ..."/"free from"

<p>Use of the words "free from Y" implies that there are not even traces of the substance Y.</p>	
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<p><b>Example:</b> + “wheat free” where not even traces of wheat are present</p> <p>These negative claims or claims on absence should not directly, indirectly or implicitly</p> <ul style="list-style-type: none"> <li>• be used if all similar goods in the same category or class or all pet food do not contain the substance in question</li> <li>• give the impression that products containing that particular substance/feature are dangerous</li> </ul>	<p>R. 767/2009 Art 11.1 (b)</p>
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### 5.2.3 Comparative claims

**This type of claim explicitly or by implication compares a specific characteristic, function or nutrient level of two or more pet foods.**

#### 5.2.3.1 General Principles for comparative claims

Comparative claims may be made provided that:

- They are not misleading or confusing
- They are fair and objective
- They compare products intended for the same use
- The point of comparison is verifiable
- They do not denigrate the compared product
- They do not suggest that it possesses special characteristics when in fact all similar pet foods possess such characteristics.

#### 5.2.3.2 Comparative claims to competitors’ products

<ul style="list-style-type: none"> <li>• Definition: “comparative advertising” means any advertising which explicitly or by implication identifies a competitor or goods or services offered by a competitor.</li> <li>• It is essential that manufacturers consult both Directive 2006/114 on Misleading and Comparative Advertising, and Directive 2005/29 on Unfair Commercial Practices as well as other applicable legislation and seek appropriate legal advice if necessary.</li> <li>• National provisions may be more restrictive and must also be respected.</li> <li>• Comparative advertising shall, as far as the comparison is concerned, be permitted when in accordance with the directive on misleading and comparative advertising as well as other applicable legislation.</li> <li>• It should be considered that comparisons to competitors’ products could be invalidated by competitor activities such as changes of recipe or label.</li> </ul>	<p>D. 2006/114, art. 2 (c)</p>
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#### 5.2.3.3 Increased/reduced level claims

<ul style="list-style-type: none"> <li>• 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 pet foods</li> <li>• The percentages of reduction/increase are measured against a reference standard adult maintenance pet food of the same product range within the</li> </ul>	
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<p>same brand, unless otherwise specified. Alternatively, the reference can also be a comparable standard pet food from another manufacturer in which case the comparative claims section 5.2.3.2 should be referred to:</p> <ul style="list-style-type: none"> <li>• Reduced &lt; 15%</li> <li>• Increased &gt; 15 %</li> </ul> <ul style="list-style-type: none"> <li>• The terms reduced or increased must be verifiable via recipe control or analysis, as appropriate.</li> <li>• Different percentages may be used on the basis of scientific evidence.</li> <li>• The general rules on labelling the amount of highlighted substances must be respected</li> </ul>	
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## 5.2.4 Product descriptors

### 5.2.4.1 Use of the term "natural"

- The term "natural" should be used only to describe substances in pet food (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

Examples of acceptable physical processes		Examples of Unacceptable physical processes/materials	
Freezing*	Extraction without chemicals*	Bleaching	Oxidation by chemicals
Concentration*	Drying*	Chemical treatments or similar	Any GM or GM derived feed material
Pasteurisation*	Smoking without chemicals*	Any GM or GM derived feed additive	
Grinding* Extrusion	Pelletisation*		
Some microbiological processes e.g. natural fermentation without the use of GMOs	Some enzymatic processes		
*Insofar as they maintain the natural composition of the feed material, substance or nutrient			

- If a compound pet food contains **only** feed materials, additives and carriers meeting the above requirements, it may be described as "natural" as long as it has not been subjected to processes other than those acceptable processes for "natural substances".
- The terms "made with natural ..." may be used provided that the natural substances are clearly identified e.g. by asterisking those substances in the composition list and using a qualifying statement.
- If a compound pet food contains **only** feed materials/additives/carriers meeting the above sections, but **also** contains vitamins and minerals from non-natural sources, the following claim shall be allowed: made with natural substances, with added vitamins and minerals.

**Example:** + Bloggo, made with natural plant extract.

#### 5.2.4.2 Use of the term "fresh"

The term fresh may describe substances used in pet food manufacture 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 substance/s from being called "fresh".

**Example:** + Bloggo made with/produced from fresh chicken

#### 5.2.4.3 Use of the terms "authentic/genuine", "real", "geographic region":

The current, widespread use of terms such as "authentic" and related terms like "real", "genuine" and similar terms like "geographical region" in relation to individual components may be used according to the principles in the following table (non-exhaustive list):

Claim Type	Example description	Substantiation
authentic/genuine	authentic Hereford Beef genuine Mexican honey	Beef from Hereford cattle (specific breed of cattle) Honey harvested in Mexico
real	real fish pieces real fruit pieces	Real fish pieces e.g. Individually Quick Frozen (IQF) fish pieces vs. manufactured chunks containing fish. Real pieces of ham – pieces of ham from the shoulder, rather than being reconstituted e.g. from leg cuts
geographic region (excluding those affected by PDO legislation* e.g. Stilton cheese, where the PDO rules must be applied)	"New Zealand Lamb"	The material named in the claim must originate from an animal that has been born and reared in the geographical region mentioned

\*Regulation 1151/2012 on quality schemes for agricultural products and foodstuffs

#### 5.2.4.4 Use of the terms "organic" or "organically produced" pet food

See point 3.2.1.15

#### 5.2.4.5 Light

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 5.2.3.2 should be referred to). Methods used to determine the energy density of a product are described in FEDIAF Nutritional Guidelines

The energy level or the claimed other reduced substance named should be labelled under analytical constituents or the composition list as appropriate .

[FEDIAF Nutritional Guidelines version 2017](#)

## 5.2.5 Functional claims

**A Functional Claim describes the effect of a complete or complementary pet food or a nutrient, substance, characteristic 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.**

### 5.2.5.1 General principles for functional claims

<p>Functional claims shall follow the same general principles as claims in general (see section 5.1).</p> <p><b>Reminder:</b> drawing particular attention to a substance having a functional effect will require its declaration with the indication of the amount either in the Composition, or Additives, or Analytical Constituents, as appropriate (see section 3.2.1.4.C and 3.2.1.5 A1, last bullet point)</p>	
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### 5.2.5.2 Nutrient function claims

<p>A nutrient function claim simply links the presence in a product of a nutrient or combination of nutrients, to the physiological role in growth, development and normal functions of the body, without any further detail about the level or degree/mechanism of the effect.</p> <p><b>Examples:</b> + Contains glucosamine supporting healthy joints + Omega fatty acids for maintaining healthy skin</p>	R. 767/2009 Art. 13 (1)
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### 5.2.5.3 Enhanced function claims

<p>An enhanced function claim describes the specific beneficial effect of nutrients or other substances, alone or in combination, on physiological functions or biological activities in the body. Enhanced function means an effect that <b>either</b> exceeds their usual role in maintaining normal metabolic functions including growth and development; <b>or</b> is related to a substance that is not essential for the animal but provides a benefit beyond nutrition. No reference should be made to particular diseases or pathological states according to R. 767/2009, Art. 13.3 (a).</p> <p><b>Example:</b> + With antioxidants (tocopherols) to help support a healthy immune system (Note: This would need to be further explained back of pack) + Contains chicory to promote growth of beneficial bacteria in the gut.</p>	
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### 5.2.5.4 Health maintenance and decreased disease risk claims

<ul style="list-style-type: none"> <li>• Claims relating to the optimisation of nutrition and the support or protection of physiological conditions are permitted.</li> <li>• This can also relate to health maintenance and to reducing the risk of disease development resulting from nutritional imbalances in a healthy animal, and therefore health maintenance/disease risk reduction claims are permitted as indicated below.</li> <li>• Such claims relate to the consumption of a product containing a nutrient or other substances, alone or in combination that help reduce the risk of disease development or maintain physiological functions or health.</li> </ul> <p><b>Example:</b> + Bloggo contains omega 3 fatty acids to help maintain healthy joints.</p>	R. 767/2009, Art 13 (2) R. 767/2009, Art 13 (3), the last half of the sentence.
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<ul style="list-style-type: none"> <li>• 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. <b>However, words such as prevent may be used if not related to a disease.</b> <b>Examples:</b> + "contains fibres to reduce risks of hairballs" + "helps avoiding build-up of tartar"</li> <li>• 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.</li> <li>• 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 veterinary medicinal product; 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.</li> <li>• See also 5.2.5.5 and 5.3.4 concerning claims relating to particular nutritional purposes</li> </ul>	<p>R. 767/2009, Art. 13.3 (a), the first half of the sentence</p> <p>Rec. 2011/25</p>
<p><b><i>Non-exhaustive examples:</i></b> <b><i>Considered medicinal - should be avoided</i></b></p> <ul style="list-style-type: none"> <li>~ Dose</li> <li>~ Dosage</li> <li>~ Cures</li> <li>~ Treatment</li> <li>~ Remedy</li> <li>~ Prevent/protect (when referring to disease)</li> <li>~ Relieves</li> <li>~ Treat</li> <li>~ Heals</li> <li>~ Repairs</li> </ul>	<p><b><i>Non-exhaustive examples:</i></b> <b><i>May not be considered as medicinal</i></b></p> <ul style="list-style-type: none"> <li>~ Use</li> <li>~ Administration</li> <li>~ Application</li> <li>~ Soothes</li> <li>~ Preparation</li> <li>~ Maintains</li> <li>~ Apply</li> <li>~ Cleanses</li> <li>~ Health/healthy</li> <li>~ Prevent/protect (when not referring to disease)</li> </ul>
<p><b><i>Other non-exhaustive examples of words that can be used</i></b> helps, provides, for, supports, reduces the risk...</p>	

### 5.2.5.5 Particular nutritional purposes (PARNUTs) 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><b>Examples:</b> + Besides the statutory statements "Bloggo dietetic pet food for cats for reduction of struvite stone recurrence" the functional claim "with fish oil to promote a shiny coat" can be used</p>	
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## 5.3 SUBSTANTIATION RULES

### 5.3.1 General

<b>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. Well substantiated claims will allow industry to offer benefits to pets and their owners and will encourage continued investments for innovation.</b>	
<ul style="list-style-type: none"><li>• 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.</li><li>• On request, the responsible person putting the product on the market has to produce all relevant elements of substantiation to the competent authority. This includes proprietary or in-house data.</li><li>• Substantiation will protect the consumer against false claims and enable him/her to make an informed purchase decision.</li><li>• 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).</li><li>• Scientific evidence can consist of existing scientific publications, published or unpublished new research or a mixture of the two.</li><li>• The dossier of substantiation/supporting evidence must be available at the time of product launch.</li><li>• Terms that are used as claims made upon pet food and human food can sound similar e.g. "low in fat for healthy weight management", "with calcium for healthy bones" "with taurine for healthy eyesight"; the basis upon which such claims are made is completely different due to the physiological differences between pets and people, as well as the fundamental differences in the way that food/feed is selected. It is not scientifically justified, therefore, to apply the same substantiation criteria to pet food claims as to human food. However, evidence collected for human food claims may where appropriate be considered in support for similar pet food claims.</li><li>• It should be noted that, if the competent authority has doubts as to the scientific substantiation of a claim, after examining the manufacturer's dossier, they may refer the claim to the Commission, who may further refer it to the EFSA.</li></ul>	R. 767/2009 Art. 13, 1 (b)

### 5.3.2 Content & product descriptor claims

**Reference to the presence or content of one or more feed materials, species, additives, nutrients, flavours or others shall follow longstanding industry practice and shall reflect the level of addition. Levels shall be lower for minor components than for major components (see glossary).**

**Quantities of feed materials shall be based on the mixing bowl principle.**

- Re-hydration of de-hydrated or concentrated feed materials can support a content claim, provided that the amount of the de-hydrated material is labelled, with the voluntary additional information of the equivalent amount if added without dehydration, and that the appropriate re-hydration factors are applied as per Annex 5, along with any additional labelling provisions therein. When using words, pictures and graphs for emphasising the presence of the concentrated feed material these may not mislead the users as to the characteristic of the feed material used, for example as to the physical state in the composition.
- 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 the inclusion level per emphasised component is indicated in the composition list
  - the typical component inclusion level is indicated in the same visual field as the inclusion level per component (for example at the end of the composition list), and in at the same font size as the composition
  - the claim is accompanied by a referral to more information on the label

**Example:** Bloggo with beef:

Front of pack: with beef\*

Back of pack: meat and animal derivatives (incl. 4% beef in the dark brown kibble\*).

At end of composition list: \*dark brown kibble typically 35% of product

- When making a marketing claim on the inclusion of and using the term "meat", the definition of meat in the glossary of this Code must be respected. This does not apply to descriptive terms that describe characteristics such as texture or to the legally defined category "meat and animal derivatives".
- Claiming a certain level of a nutrient, e.g. "only 2% fat", excludes any tolerance for the amount claimed other than analytical uncertainties and/or variations.

The declaration of the percentage by weight of a feed material must be a specific figure (e.g. 4%) and not a range or a minimum/maximum amount. A valid scientific method of analysis must be available for nutrients that are claimed.

R. 767/2009 Art. 17, 2, a

### 5.3.3 Functional claims

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

- The pet food in question must cause or contribute to a positive physiological benefit when consumed by the target species.
- In all cases of functional claims, it is necessary to be able to substantiate that the product contributes to a beneficial effect **and**
  - the substance contributing to the beneficial effect is present in the pet food product in sufficient quantities to produce the effect claimed throughout the shelf-life of the product **or**
  - the characteristic\* is present and effective throughout the shelf-life of the product.
- The effect must be maintained over the whole period of time that the pet food with the claimed benefit 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, relevant and claimed.
- For any pet food, the formulation should be such that when the recommended feeding instructions are adhered to, the claimed effect is delivered without detrimental effects e.g. unwanted weight gain.

*\* 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 – this can be described as a characteristic.*

**See Annex 6**

#### 5.3.3.1 Generic functional claims

**Generic claims are those for which well-established and recognised knowledge exists, typically functions of approved additives and/or nutrient functions. Their substantiation level is based on general (scientific) knowledge and these claims may be used subject to the criteria below being met.**

- A generic functional claim may be used - if data are well established in scientific literature and generally accepted.
- On request by the competent authority, the company making the claim must produce evidence that the claim in question is widely accepted (generic).
- This substantiation should be on the basis of published literature, and documentation demonstrating that the recipe of the pet food product ensures that the specific substance(s)/characteristic(s) needed to produce the beneficial effect are present.
- The published literature and additional documentation must be compiled prior to placing the product on the market.
- Ignoring studies or results that do not support the claim could result in its being considered invalid by the competent authorities.

### 5.3.3.2 Innovative functional claims

**Innovative claims are those that are not yet widely recognised. Their substantiation may be based on unpublished or published research (including generic research), or in-house data or a combination of these. Such claims may be used subject to the criteria below being met.**

- The claim must be based upon a comprehensive review and evaluation of all available scientific data relating to the validity of the claim, whether published or in-house, and irrespective of whether its impact is favourable or otherwise.
- Ignoring studies or results that do not support the claim could result in its being considered invalid by the competent authorities.
- Studies specifically conducted to demonstrate the efficacy of a product should be designed to deliver substantiation that is robust, and statistically valid.
- Consideration should be given to such factors as the appropriate size, age, and gender and physical condition of animals, as well as the number included in any testing panels.

### 5.3.4 Claims relating to particular nutritional purposes

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

**It has 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. (see also 5.2.5.1)**

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 I Part B of Commission Directive 2008/38/EC, and when the product is in compliance with the essential nutritional characteristics therein. However, this does not prevent PARNUT products from making additional functional claims e.g. dry products might additionally support a claim relating to teeth cleaning if it has a specific shape or texture of the kibbles.

R. 767/2009, Art 10  
D. 2008/38

### 5.3.5 Comparative claims

**Comparative claims can be made against 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 according to the general principles for comparative claims in section 5.2.3.1.**

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

- For comparisons made about nutrient or ingredient levels, records of published data or analyses or other appropriate information should be available for all products mentioned in the claim or used as a reference. The substantiation needed per product must meet the same requirements as defined under "5.3.2. Substantiation of content and product descriptor claims".
- 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 "5.3.3. Functional claims".
- Company records must be available to show that the product(s) on the market still has (have) the same relevant characteristic(s) as the product(s) tested for the claim.
- Where the claim relates to a data-set partially or completely outside of the manufacturers' control, the manufacturer may wish to consider indicating the point at which the comparison was made, or the data-set upon which it was based.

D. 2006/114

e.g. No1 selling product\*

\* based on Mintel data on 1 Jan 2014

## 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**

**Tolerances for Analytical Constituents (Part A, Annex IV R. 767/2009)**

Constituent	Declared content of the constituent [%]	Tolerance <sup>1</sup>	
		Below the labelled value	Above the labelled value
crude fat	<16	2	4
	16 - 24	12.5%	25%
	>24	3	6
crude protein	<16	2	2
	16 - 24	12.5%	12.5%
	>24	3	3
crude ash	<8	2	1
	8 - 32	25%	12.5%
	>32	8	4
crude fibre	<10	1.75	1.75
	10 - 20	17.5%	17.5%
	>20	3.5	3.5
sugar	<10	1.75	3.5
	10 - 20	17.5%	35%
	>20	3.5	7
starch	<10	3.5	3.5
	10 - 20	35%	35%
	>20	7	7
calcium	<1	0.3	0.6
	1 - 5	30%	60%
	>5	1.5	3
magnesium	<1	0.3	0.6
	1 - 5	30%	60%
	>5	1.5	3
sodium	<1	0.3	0.6
	1 - 5	30%	60%
	>5	1.5	3
total phosphorus	<1	0.3	0.3
	1 - 5	30%	30%
	>5	1.5	1.5
ash insoluble in hydrochloric acid	<1	no limits are set	0.3
	1 - <5		30%
	>5		1.5
potassium	<1	0.2	0.4
	1 - 5	20%	40%
	>5	1	2
moisture	<2	no limits are set	0.4
	2 - <5		20%
	5 - 12.5		1
	>12.5		8%
energy value <sup>2</sup>		5%	10%
protein value <sup>2</sup>		10%	20%

- 1 The tolerances are given either as an absolute percentage value (this value must be subtracted from / added to the declared content) or as a relative value marked with “%” after the value (this percentage must be applied to the declared content to calculate the acceptable deviation).
- 2 The tolerances are applicable where no tolerance has been laid down in accordance with an EU method or in accordance with an official national method in the Member State in which the feed is placed on the market or in accordance with a method adopted by the European Committee for Standardization ([https://standards.cen.eu/dyn/www/f?p=204:32:0::::FSP\\_ORG\\_ID,FSP\\_LANG\\_ID:6308,25&cs=1C252307F473504B6354F4EE56B99E235](https://standards.cen.eu/dyn/www/f?p=204:32:0::::FSP_ORG_ID,FSP_LANG_ID:6308,25&cs=1C252307F473504B6354F4EE56B99E235)).

NOTE: For cat and dog food, CEN standard 16967 is applicable: *Animal feeding stuffs: Methods of sampling and analysis - Predictive equations for metabolizable energy in feed materials and compound feed (pet food) for cats and dogs including dietetic food*

**The above tolerances are permitted when a deviation is found compared with the labelled value of the feed material or compound feed.**

**Where numerical claims are made e.g. “less than 2% fat” these tolerances do not permit to go above a numerical maximum or below a numerical minimum claimed.**

**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 %

**Example:** When there is a declared Crude ash of:

- 3 %; the minimum will be 1,0 %, the maximum will be 4 %

**Example:** When there is a declared crude 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 2.25 %, the maximum will be 5.75 %

**Example:** When there is a declared Calcium of:

- 1.2 %; the maximum will be 1.92 %, the minimum will be 0.84 %
- 0.9 %; the maximum will be 1.5 %, the minimum will be 0.6 %

**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

### **Feed additives tolerances when labelled under “Additives”:**

For feed additives labelled under “Additives”, the added amounts must be declared and correspond to the recipe formulation.

The tolerances indicated below are technical deviations only and refer to variations between the added levels in the recipe and the actual levels achieved at mixing bowl stage. This takes account of the difficulties in achieving homogeneity both in premixes and in preparing batches in production.

The following technical 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	$\geq 1000$ 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

**Note:** Due note should be taken to production losses, selection of feed materials and shelf life losses (see section 3.2.1.5.B.2)

**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 D level of:

- 1000 IU/kg the minimum will be 900IU/kg, the maximum will be 1300 IU/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 sulphate heptahydrate 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 Sodium selenite 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,  $1 \times 10^9$  CFU or 100 enzyme activity units of the respective feed additive per kg/feed.

#### **Feed additives tolerances when labelled under Analytical Constituents:**

When additives are labelled under "Analytical Constituents" these technical deviations apply in addition to the analytical deviations associated with the method of analysis used.

In the case of additives which decrease over time, the level determined by analysis before the end of shelf life should always be between the level declared under the "Analytical Constituents" and the maximum permitted limit (where applicable).

The following technical 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	$\geq 1000$ 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

## **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"> <li>• Are the feed materials grouped into the correct categories?</li> <li>• If yes, are the categories classified by descending order of weight?</li> </ul>			
Feed material declaration by specific names? Is the heading: “Composition” present?			
<ul style="list-style-type: none"> <li>• Are the feed materials used correctly named? (consistent with raw material specification or entry in feed material catalogue as appropriate)</li> <li>• If yes, are the feed materials labelled by descending order of weight?</li> </ul>			
If particular attention is drawn, ensure specific declaration in the composition, the list of additives or the analytical constituents			
Is the claim substantiation information available?			
Additives: Those with a legal maximum for at least one non-food producing animal species and those highlighted must be labelled			
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			
Signpost statement if traceability tools are placed away from the other legally required information			
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/characteristic is required.

**KEY:** Bloggo – a hypothetical brand name

X or Y – represents a variety claim (beef, chicken, poultry etc.) OR cut/type (liver, kidney etc.) OR other component such as vegetables or cereals

### **DEFINITIONS:**

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

### **VARIETY:**

All parts of authorized animals with the **exception** of: claws; hair; horns; hide (with the exception of pork rind); feathers; teeth; beaks; hooves; intestinal content; added fat.

Variety 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 animals 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 substance.

Regulation 767/2009, Article 13.1, states that:

- The labelling and the presentation of feed materials and compound feed may draw particular attention to the presence or the absence of a substance in the feed

### **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 must contain at least the required level of named claim material, species or cut as specified in this annex.

The percentage of the claimed component's inclusion must be labelled, the use of the term "minimum" is not permitted; 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. See Chapter 3.2.1.4, point C, Feed material declaration.

<b>Major Component</b>		
<b>Claim Type</b>	<b>Example description</b>	<b>Value corresponding to required level of named material</b>
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, <b>Example:</b> Additives: Sensory additives: beef flavouring X mg/kg <b>N. B.</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) <b>Example:</b> + 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 <b>Examples:</b> + Bloggo with chicken + Bloggo with chicken liver + Bloggo with chicken and rice + Bloggo contains rabbit	At <b>least</b> 4 % of the named material, or at <b>least</b> 4 % of each of the materials mentioned.  At least 4 % of feed materials from chicken At least 4 % of chicken liver  At least 4 % of feed materials from chicken and at least 4 % of rice  At least 4 % of feed materials from 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  <b>Examples:</b> + 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 feed materials from chicken  At least 14 % of feed materials from chicken and at least 4 % of rice  At least 14 % of feed materials from chicken and at least 4 % of rice  At least 14 % of feed materials from 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><b>Examples:</b></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 % feed materials from beef and at least 26 % feed materials from 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, minerals or other micro-components required for nutritional completeness 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)

<b>Minor Components/Additives/Nutrients</b>		
<b>Claim Type</b>	<b>Substantiation requirements</b>	<b>Labelling Requirements</b>
<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>The 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"> <li>- With /Contains taurine</li> <li>- With /Contains naturally occurring taurine</li> </ul> <p>Source of nutrient/additive:</p> <ul style="list-style-type: none"> <li>- Source of calcium</li> </ul>	<p>Justification (see section 5.3.2)</p>	<p>When content claim is made on packaging, declaration of a substance/additive/nutrient content is required.</p> <p>Refer to sections on additives and analytical constituents for declaration rules.</p>

- Natural source of taurine		
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### **Justification of content claims, when using concentrated feed materials**

Rehydration factors can be applied only for claims purposes and to feed materials from which only water has been removed, e.g. vegetables. Meat meals are specifically excluded except, e.g. liver powders or other feed materials of animal origin that only have water removed. The composition list must list the concentrated material at the level and the appropriate order at which the concentrated material is added.

For the justification of claims when using dehydrated or concentrated feed materials, their respective dry matter/moisture level must be based on officially published literature.

Indicative values are:

90 % for vegetables (i.e. 10 % dry matter)

75 % for components of animal origin (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](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 or concentrated components.

To comply with the requirements of R. 767/2009, materials must be declared in descending order of weight as added to the mixing bowl, including dehydrated or concentrated materials.

They may then be declared with the equivalent amount of non-dehydrated or non-concentrated material e.g. a pet food containing dehydrated carrots at x% would have them in the Composition listing at x%, but with a qualifying statement.

Example: Bloggo with carrots:

Composition: meat and animal derivatives; cereals; derivatives of vegetable origin; minerals; vegetables (0.5% dried carrot, equivalent to 4.3% carrots).

Dried carrots of moisture 10% at 0.5% are equivalent to:

0.5 kg dried carrots x 90 % dry matter = 0.45 kg of dry matter

Fresh carrots contain 90 % moisture which leads to a total amount of 4.5 kg of rehydrated carrots from dry carrots:

$0.45 \div 0.10 = 4.5$  kg rehydrated product = A

Inclusion level of dried material = 0.5 = B

It must also be taken into account what was added to the overall recipe:

$$\frac{A}{100+A-B} \times 100 = \text{percentage of material equivalent to the dehydrated/concentrated material added}$$

In the example above:

$$\frac{4.5}{100+4.5-0.5} \times 100 = 4.32\% \quad \Rightarrow \text{therefore 0.5\% dried carrots at 10\% moisture will support a "with" claim}$$

## Documentation of Claims Substantiation

**Documentation of claims substantiation must be available for all claims. This can range from the simple e.g. recipe formulation, to the more complex where a dossier containing scientific research and/or references is required.**

- a. Annex 6 contains a check list of section headings to help structure a substantiation dossier. Depending upon the complexity of the claim, some or all of these sections may be relevant.
- b. The documentation must be well-structured, self-explanatory and sufficiently detailed that the validity of the claim can be verified. Key scientific papers/data must be included along with a full bibliography for the dossier. Manufacturers should consider the technical complexity of dossiers is understandable to those less specialised in these fields.
- c. The dossier must be based upon a comprehensive review and evaluation of all available scientific data relating to the validity of the claim, whether published or in-house, and irrespective of whether its impact is favourable or otherwise. Ignoring studies or results that do not support the claim could result in its being considered invalid by the competent authorities.
- d. Manufacturers should review the substantiation of claims, specifically:
  - i. To establish whether new science has evolved that impacts the validity of the claim
  - ii. To establish whether, where comparative claims are made, the reference points have changed.
  - iii. To identify whether there have been any other changes that might affect the validity of the claim.
- e. The review of substantiation dossiers should be documented, including any amendments made to the dossier and/or the claim.

## 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
<b>Summary (one page)</b>	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	
<b>Packaging lay-out and other ways of communication</b>	a. Name and description of the product, including: essential characteristics, identification of any substances 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	
<b>The science behind claims</b>	a. Description	X	X	
	b. Published relevant literature	X	X	
	c. Research: <ul style="list-style-type: none"> <li>- research centre which conducted the research,</li> <li>- research protocol,</li> <li>- study results,</li> <li>- references</li> </ul>		X X X X	
	d. Scientific testimonials	X	X	
<b>Bibliography</b>	a. References	X	X	
	b. Abstracts or copies of scientific publications	X	X	
<b>Review Date &amp; Outcome</b>	Date on which evidence was reviewed and outcome of that review, including any amendments	X	X	

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

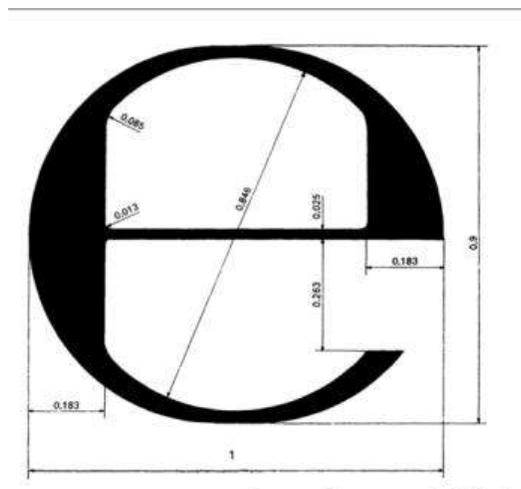
	<i>Recommended</i>	<i>Use with care</i>	<i>Best avoided</i>
<b><i>Layout</i></b>	<ul style="list-style-type: none"> <li>- Headings to be clear, short and consistent;</li> <li>- Use bold type and/or upper case text to distinguish headings;</li> <li>- Where space allows, group information which belongs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

**Annex to the section 3.2.2.1 : EC mark "e"**

All pre-packages 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 pre-package 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, as last amended by Directive 76/770.  
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 pre-package 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:



**Additives and vitamin conversion factors**

**Additives with a maximum level for at least one non-food producing animal species must be labelled, i.e. even if they have no maximum level for the target pet animal species**

**It is essential that manufacturers consult the [EU Register of Feed Additives](#) for the latest information on additives with a legal maximum**

Unit declared	Vitamin source used	Vitamin activity		
<b>IU</b>			<b>Retinol activity</b>	
	vitamin A acetate	0.344 µg	=	1 IU
	vitamin A propionate	0.359 µg	=	1 IU
	vitamin A palmitate	0.55 µg	=	1 IU
<b>IU</b>			<b>Vitamin D activity</b>	
	vitamin D <sub>3</sub> <sup>1,2</sup>	0.025 µg	=	1 IU
		1 µg	=	40 IU
<b>IU</b>			<b>Vitamin E activity</b>	
	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 <sup>1</sup>	1 mg	=	1.36 IU
	dl-α-tocopherol	1 mg	=	1.10 IU
	dl-α-tocopheryl acetate	1 mg	=	1.00 IU
<b>mg</b>			<b>Thiamine</b>	
	thiamine mononitrate	1 mg	=	0.92 mg
	thiamine hydrochloride	1 mg	=	0.89 mg
<b>IU</b>			<b>Pantothenic acid</b>	
	calcium D-pantothenate	1 mg	=	0.92 mg
<b>mg</b>			<b>Pyridoxine</b>	
	pyridoxine hydrochloride	1 mg	=	0.89 mg
<b>mg</b>			<b>Niacin</b>	
	nicotinic acid	1 mg	=	1 mg
	Nicotinamide	1 mg	=	1 mg
<b>mg</b>			<b>Choline</b>	
	choline chloride (basis choline ion)	1 mg	=	0.75 mg
	choline chloride (basis choline hydroxyl-analogue)	1 mg	=	0.87 mg
<b>mg</b>			<b>Menadione</b>	
	menadione sodium bisulphite (MSB)	1 mg	=	0.51 mg
	menadione nicotinamid bisulphite (MNB)	1 mg	=	0.46 mg

## REFERENCES

1. McDowell Vitamins in animal and human nutrition. 2<sup>nd</sup> edition Iowa State University Press 2000
2. NRC. Table 2. In: Nutrient Requirements of Cats. National Academy Press, Washington, DC 1986: 42.

### Example: Multilingual declaration of additives

Additives, Zusatzstoffe, Additifs, Additivi/kg:
Nutritional additives, ernährungsphysiologische Zusatzstoffe, additifs nutritionnels, additivi nutrizionali: 3a672c, Vitamin A 10.000 i.U./ i.E./ U.I. 3a671, Vitamin D <sub>3</sub> 1.000 i.U./ i.E./ U.I. 3b412, Copper, Kupfer, cuivre, rame 15mg
With colourants, mit Farbstoffen, avec colorants, con coloranti

**Labelling of  
Categories and Functional Groups of Feed Additives (R. 1831/2003)**

<b>Category</b>	<b>Functional Group</b>	<b>Terms to be used for labelling of functional groups (those marked with * are abbreviations which may be used instead of the full name of the functional group [R 767/2009, Annex VII, I, 3, Annex VI, I, 3])</b>
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 radionucleide contamination: substances that suppress absorption of radionucleides 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>(n) hygiene condition enhancers: substances or, when applicable, microorganisms which favourably affect the hygienic characteristics of feed</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>radionucleide controllers</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> <p>(n) <i>hygiene improvers</i> *</p>

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

**LEGISLATIVE AND NON-LEGISLATIVE REFERENCES**

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

<https://eur-lex.europa.eu/advanced-search-form.html?qid=1536933369475&action=update>

or contact [FEDIAF@FEDIAF.org](mailto:FEDIAF@FEDIAF.org)

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

<b>Doc n°</b>	<b>Title</b>	<b>Official Journal</b>
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
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. 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. 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. 829/2003	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. 1151/2012	on quality schemes for agricultural products and foodstuffs	L 343 - 14.12.2012, 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, <b>and</b>	L 300 – 14.1.2009 - p. 1
R. 142/2011	implementing Regulation 1069/2009	L 54 – 26-2-2011 – p. 1
R. 68/2013	on the Catalogue of feed materials	L 29 – 30-1-2013 – p. 1
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
D. 2011/83	on consumer rights	L 304 – 22.11.2011 – p.34
./.	FEDIAF Nutritional Guidelines for Complete and Complementary Pet Food for Cats and Dogs	<a href="http://www.FEDIAF.org">www.FEDIAF.org</a> "self-regulation"
./.	FEDIAF Nutritional Guidelines for Pet Rabbits	<a href="http://www.FEDIAF.org">www.FEDIAF.org</a> "self-regulation"
./.	European Union Register of Feed Additives	<a href="#">Click here</a> 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 other components (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 other component 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.**

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

Example: a "with carrots" variety has to contain at least 4% 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 category names as defined in EU legislation (e.g. meat and animal derivatives, vegetables, cereals, minerals, etc.) or by single ingredient names (e.g. dehydrated chicken protein, wheat, soybean meal, corn starch, chicken fat, 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 single 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 benefit of accommodating raw materials availability allowing flexibility in formulations whilst maintaining complete and balanced nutrition for pet animals. 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.

### 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).

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

or

**Composition:** *feed material (a), feed material (b), feed material (c), dried carrots (0.45%, equivalent to 4% 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.

## 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 oxide, Beta-carotene, 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", "colourants", "antioxidants" and "flavourings" 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 “8 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 words “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 fibre
- crude ash
- for products containing more than 14% moisture, the moisture level

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. Batch Code and Best Before Date**

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 to ensure that your animal receives all the essential nutrients. If you have any questions, manufacturers will be happy to help you.

## **12. Weight statement/quantity**

The weight statement on the pack is governed by the same legislation as the weight statement 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.

\* \* \* \* \*