ANNEX 12: 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 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).

Example:

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 guestion 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

- (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.

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.

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.