

A Pet Food Brand's Roadmap to AAFCO PFLM Compliance

AAFCO's Pet Food Labeling Modernization (PFLM) initiative is changing how pet food labels are structured, how nutrition information is presented, and how functional claims are evaluated.

For many pet food brands, especially startups, these updates can feel overwhelming. The key is understanding that PFLM compliance affects far more than packaging design. It impacts product classification, ingredient statements, nutritional substantiation, marketing claims, and analytical testing.

STEP 1 — Classify the Product Correctly and Review Functional Claims

The first step in PFLM compliance is determining what your product is.

Whether a product is classified as a complete food, treat, supplement, topper, or mixer affects nearly every part of the label, including nutritional adequacy statements, feeding directions, and the testing that is required. This is also the step where you want to evaluate whether you are trying to make any marketing/functional claims. For example, for a beef liver product, 'Natural Source of Vitamin A', would be best substantiated through testing for Vitamin A in the retinol form. This will also allow you to list Vitamin A as a nonessential nutrient on your label.

STEP 2 — Begin Analytical Testing

Once you have classified your product and established any goals you might have around functional claims, it is time to begin analytical testing. This is the testing that will give you the values that will be put on your product's label, like protein, dietary fiber, moisture, and fat. Any nonessential nutrient testing will also occur during this point.

The nutrient data from testing will inform the following:

- nutrient guarantees
- calorie calculations
- carbohydrates
- nonessential nutrient claims
- and functional marketing claims

Some companies may attempt to build labels using formulation estimates or supplier specifications alone. However, nutrient guarantees should be supported through testing of the finished product.

STEP 3 — Build a Compliant Pet Nutrition Facts Panel

One of the largest changes introduced through PFLM is the transition from Guaranteed Analysis to the Pet Nutrition Facts format. At RL Labs, we are proud to be one of the first to offer a fully compliant pet nutrition facts label to our customers, with an AAFCO compliant nutritional adequacy statement and ingredient statement.

During this stage brands should review:

- nutrient order
- calorie calculations/declarations
- serving size presentation
- carbohydrate calculations
- and required guarantees

Functional ingredients such as collagen, omega fatty acids, probiotics, or enzymes may trigger additional disclosure requirements, including nonessential nutrient guarantees and disclaimer language.

Before packaging is finalized, brands should verify that all required nutrients, units, and formatting align with current AAFCO guidance.

STEP 4 — Finalize Ingredient Statements & Packaging

AAFCO requires ingredients to be declared using accepted ingredient names rather than marketing terminology. Even minor wording differences can affect compliance. For example, if a product contains brown rice, it must be declared as such 'brown rice', 'rice' alone, would not be an acceptable ingredient descriptor.

Packaging should also be reviewed for:

- readability
- package formatting requirements
- disclaimer placement
- and visibility of required nutritional information (compliant with AAFCO label size dependent on package size)

Where Most Brands Encounter Problems

Most PFLM compliance issues occur when:

- Testing is started before claims and product classification are established
- Ingredient terminology does not align with AAFCO naming conventions
- The Pet Nutrition Facts label does not meet the new standards under AAFCO's PFLM framework

Why Not Wait?

Although brands are not required to transition to the new AAFCO Pet Food Labeling Modernization (PFLM) format until 2030, early adoption has clear advantages for companies looking to stay ahead in an increasingly competitive and regulated market. Transitioning sooner allows brands to proactively identify compliance gaps, validate nutrient guarantees, and avoid rushed label redesigns or reformulations as implementation deadlines approach.

Early adoption also positions products ahead of evolving retailer, distributor, and regulatory expectations while also demonstrating a strong commitment to the consumer's experience.

Because the updated Pet Nutrition Facts format closely resembles human food labeling, consumers will likely find it easier to understand the nutritional content of their pet's food. With many pet owners increasing interest in ingredient transparency, functional nutrition, and product quality, brands that adopt the modernized format early are better positioned to cater to these consumers.