

# Minnesota Commercial Pet Food Rules 1510.2500-1510.2595

Excerpted from Minnesota State Revisor's Office on 7/7/2006

<b>1510.2500</b>	<b>DEFINITIONS AND TERMS</b>	<b>Page 2</b>
<b>1510.2510</b>	<b>LABEL FORMAT AND LABELING</b>	<b>Page 2</b>
<b>1510.2520</b>	<b>BRAND NAMES AND PRODUCT NAMES</b>	<b>Page 3</b>
<b>1510.2530</b>	<b>EXPRESSION OF GUARANTEES</b>	<b>Page 5</b>
<b>1510.2540</b>	<b>INGREDIENTS</b>	<b>Page 8</b>
<b>1510.2550</b>	<b>DRUGS AND PET FOOD ADDITIVES</b>	<b>Page 9</b>
<b>1510.2560</b>	<b>NUTRITIONAL ADEQUACY</b>	<b>Page 9</b>
<b>1510.2570</b>	<b>FEEDING DIRECTIONS</b>	<b>Page 12</b>
<b>1510.2580</b>	<b>STATEMENTS OF CALORIE CONTENT</b>	<b>Page 13</b>
<b>1510.2590</b>	<b>DESCRIPTIVE TERMS</b>	<b>Page 14</b>
<b>1510.2595</b>	<b>MANUFACTURER OR DISTRIBUTOR, NAME AND ADDRESS</b>	<b>Page 17</b>

**1510.2500 DEFINITIONS AND TERMS.**

Subpart 1. **Scope.** The definitions in this part and Minnesota Statutes, section [25.33](#), apply to parts 1510.2500 to [1510.2595](#).

Subp. 2. **All life stages.** "All life stages" means gestation/lactations, growth, and adult maintenance life stages.

Subp. 3. **Family.** "Family" means a group of products that are nutritionally adequate for any or all life stages based on nutritional similarity to a lead product, which has been successfully test-fed according to an AAFCO feeding protocol.

Subp. 4. **Immediate container.** "Immediate container" means the unit, can, box, tin, bag, or other receptacle or covering in which a pet food or specialty pet food is displayed for sale to retail purchasers, but does not include containers used as shipping containers.

Subp. 5. **Ingredient statement.** "Ingredient statement" means a collective and contiguous listing on a label of the ingredients making up the pet food or specialty pet food.

Subp. 6. **Principal display panel.** "Principal display panel" means the part of a label that is most likely to be displayed, presented, shown, or examined under normal and customary conditions of display for retail sale.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
*Current as of 06/05/06*

**1510.2510 LABEL FORMAT AND LABELING.**

Subpart 1. **Required information.** Pet food and specialty pet food must be labeled with the following information:

A. the product name and brand name, if any, on the principal display panel as specified in part [1510.2520](#);

B. a statement specifying the species name of the pet or specialty pet for which the food is intended, conspicuously designated on the principal display panel;

C. a quantity statement as defined in Minnesota Statutes, section [25.33](#), subdivision 24, on the principal display panel;

D. guaranteed analysis as specified in part [1510.2530](#);

E. an ingredient statement as specified in part [1510.2540](#), subpart 1;

F. a statement of nutritional adequacy or purpose if required under part [1510.2560](#);

G. feeding directions if required under part [1510.2570](#); and

H. the name and address of the manufacturer or distributor as specified in part [1510.2595](#).

Subp. 2. **Outer containers.** If a pet food or specialty pet food enclosed in an outer container or wrapper is intended for retail sale, all required label information must appear on the outer container or wrapper.

Subp. 3. **Graphics.** A vignette, graphic, or pictorial representation on a pet food or specialty pet food label must not misrepresent the contents of the package.

Subp. 4. **Use of "proven."** The use of the term "proven" in connection with a label claim for a pet food or specialty pet food is not permitted unless the claim is substantiated by scientific or other empirical evidence.

Subp. 5. **Comparison.** No statement may appear upon the label or labeling of a pet food or specialty pet food that makes false or misleading comparisons between that product and any other product.

Subp. 6. **Endorsement.** A personal or commercial endorsement is permitted on a pet food or specialty pet food label if it is not false or misleading.

Subp. 7. **"New" or "improved" claims.** A statement on a pet food or specialty pet food label stating "improved," "new," or a similar designation must be substantiated and limited to six months' production.

Subp. 8. **Preference.** A statement on a pet food or specialty pet food label stating preference or comparative attribute claims must be substantiated and is limited to one year of production, after which the claim must be removed or resubstantiated.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
*Current as of 06/05/06*

#### **1510.2520 BRAND AND PRODUCT NAMES.**

Subpart 1. **Certain terms.** The terms "100 percent," "all," or similar terms must not be used in the brand or product name of a pet food or specialty pet food if the product contains more

than one ingredient, not including water sufficient for processing, decharacterizing agents, or trace amounts of preservatives and condiments.

Subp. 2. **Ingredients in name.** An ingredient or a combination of ingredients may form a part of the product name of a pet food or specialty pet food if:

A. the ingredients derived from animals, poultry, or fish constitute at least 95 percent of the total weight of the product. Water sufficient for processing may be excluded when calculating the percentage, however, the ingredients must constitute at least 70 percent of the total product weight;

B. any ingredient constitutes at least 25 percent of the weight of the product, provided that:

(1) water sufficient for processing may be excluded when calculating the percentage, as long as the ingredients constitute at least ten percent of the total product weight;

(2) a descriptor is used with the ingredient names, implying that other ingredients are included in the product formula. Examples of descriptors include "dinner," "platter," "entree," "formula," and "recipe"; and

(3) the descriptor is in the same size, style, and color print as the ingredient names;

C. the combination of ingredients included in the product name complies with the following:

(1) each ingredient constitutes at least three percent of the product weight, excluding water sufficient for processing;

(2) the names of the ingredients appear in the order of respective predominance by weight in the product; and

(3) all the ingredient names appear on the label in the same size, style, and color print.

Subp. 3. **With ingredient.** If the name of an ingredient appears in the product name of a pet food or specialty pet food or elsewhere on the product label and includes a descriptor such as "with" or similar designation, the named ingredients must each constitute at least three percent of the product weight exclusive of water for processing. If the names of more than one ingredient are shown, they appear in respective order of predominance by weight in the product. The three-percent minimum level does not apply to claims for condiments or nutrients, such as, but not limited to, vitamins, minerals, and fatty acids. The word "with," or similar designation, and named ingredients must be in the same size, style, color, and case print and be of no greater size than:

Panel Size	Maximum "With Claim" Type Size
<5 square inches	1/8 inch
5-25 square inches	1/4 inch
25-100 square inches	3/8 inch
100-400 square inches	1/2 inch
400+ square inches	1 inch

Subp. 4. **Flavor.** A flavor designation may be included as part of the product name or elsewhere on the label of a pet food or specialty pet food if the flavor designation meets the following requirements:

A. the flavor designation:

(1) conforms to the name of the ingredient as listed in the ingredient statement; or

(2) is identified by the source of the flavor in the ingredient statement; and

B. the word "flavor" is printed in the same size type and with an equal degree of conspicuousness as the name of the flavor designation.

Subp. 5. **Derivation from ingredient.** The product name of the pet food or specialty pet food must not be derived from one or more ingredients unless all ingredients are included in the name, except as specified by subpart 2 or 3, except that the name of an ingredient or combination of ingredients may be used as a part of the product name if:

A. the ingredient or combination of ingredients is present in sufficient quantity to impart a distinctive characteristic to the product or is present in amounts that have a material bearing upon the price of the product or upon acceptance of the product by the purchaser; or

B. it does not constitute a representation that the ingredient or combination of ingredients is present to the exclusion of other ingredients.

Subp. 6. **Contractions; coined names.** Contractions or coined names referring to ingredients must not be used in the brand name of a pet food or specialty pet food unless they comply with subpart 2, 3, or 4.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
Current as of 06/05/06

**1510.2530 EXPRESSION OF GUARANTEES.**

Subpart 1. **Order and format.** The guaranteed analysis statements must comply with items A to D:

A. A pet food or specialty pet food label must list the following guarantees in the following order:

- (1) minimum percentage of crude protein;
- (2) minimum percentage of crude fat;
- (3) maximum percentage of crude fat, if required by part [1510.2590](#);
- (4) maximum percentage of crude fiber;
- (5) maximum percentage of moisture; and
- (6) other guarantees.

B. If ash is listed in the guaranteed analysis on a pet food or specialty pet food label, it must be guaranteed as a maximum percentage and must immediately follow the moisture guarantee.

C. A dog or cat food label must list other required or voluntary guarantees in the same order and units of the nutrients in the AAFCO Dog or Cat Food Nutrient Profiles. Guarantees for substances not listed in the AAFCO Dog or Cat Food Nutrient Profiles, or not otherwise provided for in items A to D, must immediately follow the listing of the recognized nutrients and be accompanied by an asterisk referring to the disclaimer "not recognized as an essential nutrient by the AAFCO Dog or Cat Food Nutrient Profiles." The disclaimer must appear immediately after the last guarantee under this item in the same size type as the guarantee.

D. A specialty pet food label must list other required or voluntary guarantees as required by part [1510.1943](#).

Subp. 2. **Sliding scale method.** The sliding scale method of expressing a guaranteed analysis on a pet food or specialty pet food label (for example, "Minimum crude protein 15-18 percent") is prohibited.

Subp. 3. **Mineral supplement.** The label of a pet food or a specialty pet food that is formulated as and represented to be a mineral supplement must include:

A. minimum guarantees for all minerals from sources declared in the ingredient statement and established by an AAFCO-recognized nutrient profile, expressed as the element in units specified in the nutrient profile;

B. minimum guarantees for all minerals from sources declared in the ingredient statement expressed as the element in units specified in part [1510.2070](#), subpart 2, item B, if no species-specific nutrient profile has been recognized by AAFCO;

C. mineral guarantees required by this subpart may be

expressed in milligrams (mg) per unit, such as tablets, capsules, granules, or liquids, consistent with those employed in the quantity statement and directions for use; and

D. a weight equivalent such as 1 fluid ounce = 28 grams, for liquid products.

Subp. 4. **Vitamin supplement.** The label of a pet food or a specialty pet food that is formulated as and represented to be a vitamin supplement must include:

A. minimum guarantees for all vitamins from sources declared in the ingredient statement and established by an AAFCO-recognized nutrient profile, expressed in units specified in the nutrient profile;

B. minimum guarantees for all vitamins from sources declared in the ingredient statement expressed in units specified in part [1510.2070](#), subpart 3, if no species-specific nutrient profile has been recognized by AAFCO;

C. vitamin guarantees required by this subpart may be expressed in approved units, such as IU, mg, or g, per unit, such as tablets, capsules, granules, or liquids, consistent with those employed in the quantity statement and directions for use; and

D. a weight equivalent (1 fluid ounce = 28 grams) for liquid products.

Subp. 5. **Nutrient comparison.** If the label of a pet food or specialty pet food includes a comparison of the nutrient content of the food with levels established by an AAFCO-recognized nutrient profile, such as a table of comparison, a percentage, or any other designation referring to an individual nutrient or all of the nutrient levels, items A to D apply.

A. The product must meet the AAFCO-recognized nutrient profile.

B. The statement of comparison must be preceded by a statement that the product meets the AAFCO-recognized profile. That statement is not required, however, if the nutritional adequacy statement required by part [1510.2560](#) or [1510.2570](#) appears elsewhere on the product label.

C. The statement of comparison of the nutrient content must constitute a guarantee, but need not be repeated in the guaranteed analysis.

D. The statement of comparison may appear on the label separate and apart from the guaranteed analysis.

Subp. 6. **Maximum moisture.** The maximum moisture declared on a pet food or specialty pet food label must not exceed 78 percent or the natural moisture content of the ingredients,

whichever is higher, except when the pet food or specialty pet food is not intended to be and is not labeled as complete and balanced for any or all life stages.

Subp. 7. **Crude protein, crude fat, or crude fiber.**

Guarantees for crude protein, crude fat, and crude fiber are not required if the pet food or specialty pet food is intended for purposes other than to furnish the substances or the substances are of minor significance relative to the primary purpose of the product, such as a mineral or vitamin supplement.

Subp. 8. **Microorganisms and enzymes.** Guarantees for microorganisms and enzymes shall be stated in the format specified in part [1510.2070](#).

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
Current as of 06/05/06

**1510.2540 INGREDIENTS.**

Subpart 1. **Format.** Each ingredient of a pet food or specialty pet food must be listed in the ingredient statement in compliance with items A to D.

A. The names of all ingredients in the ingredient statement must be shown in letters or type of the same size.

B. The ingredients must be listed in descending order by predominance by weight in nonquantitative terms.

C. Ingredients must be listed and identified by the name and definition established by AAFCO.

D. Any ingredient with no established name and definition must be identified by the common or usual name of the ingredient.

Subp. 2. **Meat; meat by-products.** The ingredients "meat" or "meat by-products" must be qualified to designate the animal from which the meat or meat by-products are derived unless the meat or meat by-products are derived from cattle, swine, sheep, goats, or any combination of those animals. For example, ingredients derived from horses must be listed as "horsemeat" or "horsemeat by-products."

Subp. 3. **Brand or trade names.** Brand or trade names must not be used in an ingredient statement.

Subp. 4. **Ingredient attribute.** A reference to the quality, nature, form, or other attribute of an ingredient is allowed if the reference meets the following requirements:

A. the designation is not false or misleading;

B. the ingredient imparts a distinctive characteristic to the pet food or specialty pet food because it possesses that attribute; and

C. a reference to quality or grade of the ingredient does not appear in the ingredient statement.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
Current as of 06/05/06

#### **1510.2550 DRUGS AND PET FOOD ADDITIVES.**

Subpart 1. **Artificial color.** An artificial color may be used in a pet food or specialty pet food if it is listed in Code of Federal Regulations, title 21, part 73A, for food coloring exempt from certification, or in Code of Federal Regulations, title 21, part 74A, for food coloring subject to certification. The coloring must be used within the conditions, limitations, and tolerances prescribed for the specific coloring substance.

Subp. 2. **Safety, efficacy, and utility.** Feed ingredients, including drugs, other special purpose additives, and nonnutritive additives may be used in the formulation of a pet or specialty pet food if the ingredient's safety, efficacy, and utility are established under one of the following methods:

A. the pet food or specialty pet food contains additives, the use of which conforms to the requirements of the applicable regulation in Code of Federal Regulations, title 21, or which are "prior sanctioned" or "informal review sanctioned" or "generally recognized as safe" for use; or

B. the pet food or specialty pet food is a drug or contains a drug as defined in Minnesota Statutes, section [25.33](#), subdivision 8, and is "generally recognized as safe and effective" for the labeled use or is marketed subject to an application approved by the Food and Drug Administration under United States Code, title 21, section 360(b).

Subp. 3. **Included drugs.** If a drug is included in a pet food or specialty pet food, the format required by part [1510.1947](#), subpart 3, for labeling medicated feeds must be used for branded products, and part [1510.1943](#), subpart 2, item G, must be used for customer formula products.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
Current as of 06/05/06

#### **1510.2560 NUTRITIONAL ADEQUACY.**

Subpart 1. **Label claims.** The label of a pet food or

specialty pet food that is intended for all life stages of the pet or specialty pet may include an unqualified claim, directly or indirectly, such as "complete and balanced," "perfect," "scientific," or "100% nutritious" if at least one of the following apply:

A. the product meets the nutrient requirements for all life stages established by an AAFCO-recognized nutrient profile;

B. the product meets the criteria for all life stages as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol; or

C. the product is a member of a product family that is nutritionally similar to a lead product containing a combination of ingredients that has been fed to a normal animal as the sole source of nourishment in accordance with the testing procedures established by AAFCO for all life stages, and:

(1) the nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and

(2) the family product meets the criteria for all life stages.

Subp. 2. **Qualified claim.** The label of a pet food or specialty pet food that is intended for a limited purpose or a specific life stage, but not for all life stages, may include a qualified claim such as "complete and balanced," "perfect," "scientific," or "100% nutritious" if the product and claim meets all of the following:

A. the claim is qualified with a statement of the limited purpose or specific life stage for which the product is intended or suitable, such as, "complete and balanced for puppies or kittens," and the claim and the required qualification is juxtaposed on the same label panel and in the same size, style, and color print; and

B. the product meets at least one of the following:

(1) the nutrient requirements for the limited purpose or specific life stage established by an AAFCO-recognized nutrient profile;

(2) the criteria for a limited purpose or a specific life stage as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol; or

(3) the requirements of a product family which is nutritionally similar to a lead product which contains a combination of ingredients which, when fed for the limited purpose, will satisfy the nutrient requirements for the limited purpose and has had its capabilities in this regard demonstrated by adequate testing, and:

(a) the nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and

(b) the family product meets the criteria for the limited purpose.

Subp. 3. **Nutritional adequacy statement.** Dog and cat food labels must include a statement of nutritional adequacy or purpose of the product except when the dog or cat food is clearly and conspicuously identified on the principal display panel as a "snack" or "treat." The statement must consist of one of the following:

A. a claim that the dog or cat food meets the requirements of one or more of the recognized categories of nutritional adequacy: gestation/lactation, growth, maintenance, and all life stages. The claim must be stated verbatim as one of the following:

(1) "(Name of product) is formulated to meet the nutritional levels established by the AAFCO Dog (or Cat) Food Nutrient Profiles for ....." (Blank is to be completed by using the stage or stages of the pet's life, such as, gestation/lactation, growth, maintenance, or the words "All Life Stages");

(2) "Animal feeding tests using AAFCO procedures substantiate that (Name of Product) provides complete and balanced nutrition for ....." (Blank is to be completed by using the stage or stages of the pet's life tested, such as, gestation/lactation, growth, maintenance, or the words "All Life Stages"); or

(3) "(Name of Product) provides complete and balanced nutrition for ....." (Blank is to be completed by using the stage or stages of the pet's life, such as gestation/lactation, growth, maintenance, or the words "All Life Stages") and is comparable in nutritional adequacy to a product which has been substantiated using AAFCO feeding tests;

B. a nutritional or dietary claim for purposes other than those listed in subpart 1 or 2, if the claim is scientifically substantiated; or

C. the statement "This product is intended for intermittent or supplemental feeding only," if a product does not meet the requirements of this part or any other special nutritional or dietary need and so is suitable only for limited or intermittent or supplementary feeding.

Subp. 4. **Veterinary supervision.** A product intended for use by a veterinarian, or under the supervision or direction of a veterinarian must contain a statement in accordance with part 1510.2560, subpart 3.

Subp. 5. **Acceptable basis for claim.** The following AAFCO-recognized nutritional authority, nutrient profile, and animal feeding protocol are acceptable as the basis for a claim of nutritional adequacy:

A. as an AAFCO-recognized nutrient profile or nutritional authority:

(1) for dogs, the AAFCO Dog Food Nutrient Profiles;

(2) for cats, the AAFCO Cat Food Nutrient Profiles; and

(3) for specialty pets, the nutrient recommendations approved by the Committee on Animal Nutrition of the National Research Council of the National Academy of Sciences, provided that this nutrient recommendation is recognized only for the specific specialty pet for which the profile is intended; and

B. as an AAFCO-recognized animal feeding protocol, the AAFCO Dog and Cat Food Feeding Protocols.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
*Current as of 06/05/06*

#### **1510.2570 FEEDING DIRECTIONS.**

Subpart 1. **Labeling requirements.** Feeding directions must be listed on the product label of all dog or cat food, including snacks or treats, labeled as complete and balanced for any or all life stages, as provided in part [1510.2560](#), subpart 3, except those pet foods labeled in accordance with part [1510.2560](#), subpart 4. The directions must be consistent with the intended use indicated in the nutritional adequacy statement, unless a limited use or more limited life stage designation is declared elsewhere, such as "adult formula." These directions must be expressed in common terms and must appear prominently on the label. Feeding directions must, at a minimum, state, "Feed (weight/unit of product) per (weight only) of dog (or cat)." The frequency of feeding must also be specified.

Subp. 2. **Veterinary supervision.** If a dog or cat food is intended for use by or under the supervision or direction of a veterinarian, the statement: "Use only as directed by your veterinarian" may be used in lieu of feeding directions.

Subp. 3. **Specialty pet foods.** Feeding directions must be listed on the product label of all specialty pet food, including snacks or treats, labeled as complete and balanced for any or all life stages, as provided in part [1510.2560](#), subpart 1. These feeding directions must be adequate to meet the nutrient

requirements of the intended species of specialty pet as recommended by the AAFCO-recognized nutritional authority. These directions must be expressed in common terms and must appear prominently on the label. The frequency of feeding must also be specified.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
Current as of 06/05/06

**1510.2580 STATEMENTS OF CALORIE CONTENT.**

Subpart 1. **Label requirements.** Except as required in part [1510.2590](#), the label of a dog or cat food may bear a statement of calorie content if the label complies with items A to E.

A. The statement must be separate and distinct from the guaranteed analysis and must appear under the heading "Calorie Content."

B. The statement must be measured in terms of metabolizable energy (ME) on an "as fed" basis and must be expressed as "kilocalories per kilogram" (kcal/kg) of product, and may also be expressed as kilocalories per familiar household measure, such as cans, cups, or pounds.

C. The calorie content must be determined by one of the following methods:

(1) by calculation using the "Modified Atwater" formula:

$$\text{ME(kcal/kg)} = 10[(3.5 \times \text{CP}) + (8.5 \times \text{CF}) + (3.5 \times \text{NFE})]$$

Where: ME = Metabolizable Energy

CP = % crude protein "as fed"

CF = % crude fat "as fed"

NFE = % nitrogen-free extract (carbohydrate) "as fed"

and the percentages of CP and CF are the arithmetic averages from proximate analyses of at least four production batches of the product, and the NFE is calculated as the difference between 100 and the sum of CP, CF, and the percentages of crude fiber, moisture, and ash (determined in the same manner as CP and CF); or

(2) in accordance with a testing procedure established by AAFCO.

D. An affidavit must be provided upon request to the commissioner when a laboratory analysis of the dog or cat food performed by the department under authority of Minnesota

Statutes, section [25.41](#), has found that the calorie count differs from the label calorie statement, substantiating that the calorie content was determined by:

(1) item C, subitem (1), in which case the results of all the analyses used in the calculation must accompany the affidavit; or

(2) item C, subitem (2), in which case the summary data used in the determination of calorie content shall accompany the affidavit.

E. The calorie content statement must appear as one of the following:

(1) the claim on the label or other labeling must be followed parenthetically by the term "calculated" if the calorie content is determined in accordance with item C, subitem (1); or

(2) the value of calorie content stated on the label which is determined in accordance with item C, subitem (2), must not exceed or understate the value determined in accordance with item C, subitem (1), by more than 15 percent.

Subp. 2. **Comparative claims.** Comparative claims must not be false, misleading, or given undue emphasis and must be based on the same methodology for the products compared.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
*Current as of 06/05/06*

#### **1510.2590 DESCRIPTIVE TERMS.**

##### **Subpart 1. Calorie terms.**

A. A dog food product that bears on its label the terms "light," "lite," "low calorie," or words of similar designation must:

(1) contain no more than 3,100 kcal ME/kg for products containing less than 20 percent moisture, no more than 2,500 kcal ME/kg for products containing 20 percent or more but less than 65 percent moisture, and no more than 900 kcal ME/kg for products containing 65 percent or more moisture;

(2) include on the label a calorie content statement:

(a) in accordance with the format provided in part [1510.2580](#); and

(b) which states no more than 3,100 kcal ME/kg for products containing less than 20 percent moisture, no

more than 2,500 kcal ME/kg for products containing 20 percent or more but less than 65 percent moisture, and no more than 900 kcal ME/kg for products containing 65 percent or more moisture; and

(3) include on the label feeding directions which reflect a reduction in calorie intake consistent with the intended use.

B. A cat food product that bears on its label the terms "light," "lite," "low calorie," or words of similar designation must:

(1) contain no more than 3,250 kcal ME/kg for products containing less than 20 percent moisture, no more than 2,650 kcal ME/kg for products containing 20 percent or more but less than 65 percent moisture, and no more than 950 kcal ME/kg for products containing 65 percent or more moisture; and

(2) include on the label a calorie content statement:

(a) in accordance with the format provided in part [1510.2580](#); and

(b) which states no more than 3,250 kcal ME/KG for products containing less than 20 percent moisture, no more than 2,650 kcal ME/kg for products containing 20 percent or more but less than 65 percent moisture, and no more than 950 kcal ME/kg for products containing 65 percent or more moisture; and

(3) include on the label feeding directions which reflect a reduction in calorie intake consistent with the intended use.

C. A dog or cat food product that bears on its label a claim of "fewer calories," "reduced calories," or words of similar designation, must include on the label:

(1) the name of the product of comparison and the percentage of calorie reduction, expressed on an equal weight basis, explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears;

(2) the comparative statement printed in type of the same color and style and at least one-half the type size used in the claim;

(3) a calorie content statement in accordance with the format provided in part [1510.2580](#); and

(4) feeding directions that reflect a reduction in calories compared to feeding directions for the product of comparison. A comparison between products in different categories of moisture content, for example, less than 20

percent, 20 percent or more but less than 65 percent, 65 percent or more, is misleading.

Subp. 2. **Fat terms.**

A. A dog food product that bears on its label the terms "lean," "low fat," or words of similar designation must:

(1) contain no more than nine percent crude fat for products containing less than 20 percent moisture, no more than seven percent crude fat for products containing 20 percent or more but less than 65 percent moisture, and no more than four percent crude fat for products containing 65 percent or more moisture;

(2) include on the product label in the guaranteed analysis:

(a) a maximum crude fat guarantee immediately following the minimum crude fat guarantee in addition to the mandatory guaranteed analysis information as specified in part [1510.2530](#), subpart 1, item A; and

(b) a maximum crude fat guarantee that is no more than nine percent crude fat for products containing less than 20 percent moisture, no more than seven percent crude fat for products containing 20 percent or more but less than 65 percent moisture, and no more than four percent crude fat for products containing 65 percent or more moisture.

B. A cat food product that bears on its label the terms "lean," "low fat," or words of similar designation must:

(1) contain a maximum percentage of crude fat that is no more than ten percent crude fat for products containing less than 20 percent moisture, no more than eight percent crude fat for products containing 20 percent or more but less than 65 percent moisture, and no more than five percent crude fat for products containing 65 percent or more moisture; and

(2) include on the product label in the guaranteed analysis:

(a) a maximum crude fat guarantee immediately following the minimum crude fat guarantee in addition to the mandatory guaranteed analysis information as specified in part [1510.2530](#), subpart 1, item A; and

(b) a maximum crude fat guarantee that is no more than ten percent crude fat for products containing less than 20 percent moisture, no more than eight percent for products containing 20 percent or more but less than 65 percent moisture, and no more than five percent crude fat for products containing 65 percent or more moisture.

C. A dog or cat food product that bears on its label

a claim of "less fat," "reduced fat," or words of similar designation, must include on the label:

(1) the name of the product of comparison and the percentage of fat reduction (expressed on an equal weight basis) explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears;

(2) a maximum crude fat guarantee in the guaranteed analysis immediately following the minimum crude fat guarantee in addition to the mandatory guaranteed analysis information as specified in part [1510.2530](#), subpart 1, item A; and

(3) the comparative statement printed in type of the same color and style and at least one-half the type size used in the claim. A comparison on the label between products in different categories of moisture content, for example, less than 20 percent, 20 percent or more but less than 65 percent, 65 percent or more, is misleading.

STAT AUTH: MS s [25.40](#)

HIST: 29 SR 655  
*Current as of 06/05/06*

**1510.2595 MANUFACTURER OR DISTRIBUTOR; NAME AND ADDRESS.**

Subpart 1. **General rule.** The label of a pet food or specialty pet food must specify the name and address of the manufacturer or distributor. The statement of the place of business must include the street address, city, state, and zip code. However, the street address may be omitted if the street address is shown in a current city directory or telephone directory for the city listed on the label.

Subp. 2. **Specific plants.** If a person manufactures or distributes a pet food or specialty pet food in a place other than the principal place of business, the label may state the principal place of business in lieu of the actual place where each package of the pet food or specialty pet food was manufactured or packaged or from which each package is to be distributed.