



Ohio Administrative Code

Rule 901:5-7-25 Statements of Calorie Content for Pet Food and Specialty Pet Food.

Effective: September 21, 2014

(A) The label of a dog or cat food shall bear a statement of calorie content and meet all of the following:

(1) The statement shall be separate and distinct from the "Guaranteed Analysis" and shall appear under the heading "Calorie Content";

(2) The statement shall 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 (e.g., cans, cups, pounds) or unit of product (e.g., treats or pieces); and

(3) The calorie content is determined by one of the following methods:

(a) By calculation using the following "modified at water" 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 = per cent crude protein "as fed"; CF = per cent crude fat "as fed"; NFE = per cent nitrogen-free extract (carbohydrate) "as fed"; and the percentages of CP and CF are the average values these components in the product as determined by sound scientific methods, such as, but not limited to scientifically accurate calculations made from the formula of the product or upon chemical analysis of the product. The NFE is calculated as the difference between one hundred 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

(b) In accordance with a testing procedure established by the AAFCO.

(4) An affidavit shall be provided upon request to the department substantiating that the calorie



content was determined by:

(a) Paragraph (A)(3)(a) of this rule, in which case the results of all the analyses used in the calculation shall accompany the affidavit; or

(b) Paragraph (A)(3)(b) of this rule, in which case the summary data used in the determination of calorie content shall accompany the affidavit.

(5) The calorie content statement shall appear as one of the following:

(a) The heading "Calorie Content" on the label or other labeling shall be followed parenthetically by the word "calculated" when the calorie content is determined in accordance with paragraph (A)(3)(a) of this rule; or

(b) The heading "Calorie Content" on the label or other labeling shall be followed parenthetically by the word "fed" when the calorie content is determined in accordance with paragraph (A)(3)(a) of this rule.

(B) Comparative claims shall not be false, misleading, or given undue emphasis and shall be based on the same methodology for the products compared.