



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

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DATE: June 06, 2025
TO: Office of the Code Reviser
FROM: Gloriann Robinson, Agency Rules Coordinator
SUBJECT: FSCS-AF-25-0001 Pet Food Label Modernization Enforcement Discretion

On June 6, 2025, the Washington State Department of Agriculture (WSDA) signed a policy statement regarding the delayed enforcement and regulatory discretion of Pet Food Label Modernization (PFLM) changes as captured in chapter 16-252 WAC Commercial Feed-Pet Food and Specialty Pet Food Rules. Extensive changes are required, and this will give businesses adequate time to come into compliance with the new rules. This policy action is in alignment with recommendations by the Association of American Feed Control Officials (AAFCO) and National Association of State Departments of Agriculture (NASDA). Therefore, WSDA will delay enforcement of PFLM requirements until July 1, 2030.

A copy of the policy statement may be obtained by accessing our website or by contacting:

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POLICY STATEMENT
Number: FSCS-AF-25-0001

Title: Pet Food Label Modernization Enforcement Discretion

Supersedes: Not Applicable

Contact: Ashlee-Rose Ferguson, Animal Feed Program Manager
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Approved By: 
Derek I. Sandison, Director

Date Approved: June 6, 2025

Purpose

Pet Food Label Modernization (PFLM) aims to improve pet food and specialty pet food labels. PFLM makes labels more similar to human food labels while providing more consistency for label format and information. PFLM also introduces optional safe handling instructions. The changes will lead to more label transparency and consumer protection and understanding of pet and specialty pet food labels.

The new requirements are thorough and require additional logistics to become fully compliant. Industry will need to invest additional time in educating themselves, planning and implementing the changes. The transition can vary widely depending on the size of the company and the number of products they may have. Large companies can have hundreds of pet food products; therefore, the transition period is anticipated to be both a lengthy and burdensome process. The new requirements include, but are not limited to, obtaining new laboratory analysis for each product to comply with the Nutrition Facts Box requirement with a change from crude fiber guarantee to dietary fiber; packaging design updates, materials and printing; artwork creation; information system changes; and advertising and/or educating retailers and consumers.

Based on extensive analysis and consideration, the department has determined that it will provide a grace period until July 1, 2030 for businesses to come into compliance with the new rule where the business is complying with the requirements as they existed prior to the new rule. This grace period will allow for businesses to prepare for, and potentially spread-out costs associated with coming into compliance.

Policy Statement Description

In order to provide Washington state pet food and specialty pet food guarantors with sufficient time to implement the PFLM requirements as identified in the Association of American Feed Control Officials (AAFCO) 2025 Official Publication (OP) adopted in chapter 16-252 WAC, on June 6, 2025. the department will delay enforcement of any new requirements until July 1, 2030.

Until July 1, 2030, the department does not intend to enforce violations of the new rule where a noncompliant label is in compliance with the requirements for labels as they existed prior to June 6, 2025. The department will not accept labels that mix new requirements and old requirements, also known as hybrid labels. The department will accept labels in compliance with the old requirements until July 1, 2030, as well as labels in compliance with the new PFLM requirements prior to July 1, 2030.

Pre-existing requirements or other non-PFLM changes do not apply to the enforcement discretion period.

WSDA will align with AAFCO membership approved adjustments, if any, to the duration of the enforcement discretion period and amend this policy as needed.

Background

WSDA is required under RCW 15.53.9012 to carry out the provisions of the Washington Commercial Feed Law and is required to consider the AAFCO OP when adopting rules necessary to carry out the purpose of chapter 15.53 RCW. The OP contains, in essence, a model bill, regulations, and a list of ingredients approved for use in animal food. All updates to the model bill and regulations undergo a thorough, multi-disciplinary deliberation process and ultimately get approved or denied by AAFCO membership. AAFCO members include animal food regulators and laboratory officials. However, industry, consumers and academic advisors are also involved in the process by way of providing perspective, suggestions, and voting at a workgroup level. It is important for all states, including Washington, to stay up to date with the model bill's adoption and regulations to both increase regulatory consistency nationwide and promote the facilitation of interstate commerce.

WSDA adopted the 2025 version of the AAFCO OP in chapter 16-252 WAC with the objective aimed at modernizing pet food and specialty pet food label's nutritional information to more closely align with human food labels. Further, this regulatory effort provides more transparency and consumer protection and understanding of pet and specialty pet food by requiring consistent product information label locations.

The PFLM project at AAFCO was initiated in 2015 and represents over a decade of collaborative work among state regulators, industry stakeholders, consumer advocates, and labeling experts to improve transparency, consistency, and consumer understanding of pet food labeling. The process involved extensive technical review, pilot testing, public feedback, and iterative refinement to balance consumer needs with the practical realities of manufacturing and distribution. The final model regulations adopted by AAFCO reflect a significant shift from traditional labeling standards and mark one of the most comprehensive overhauls in pet food labeling in decades. This prolonged and collaborative process underscores both the complexity and importance of the changes being implemented nationwide.

Related Documents

- [Chapter 15.53 RCW Washington Commercial Feed Law](#)
- [Chapter 16-252 WAC Washington Commercial Feed- Pet Food and Specialty Pet Food Rules, 2018 version](#)

- [Chapter 16-252 WAC Washington Commercial Feed- Pet Food and Specialty Pet Food Rules, 2025 version](#)
- [AAFCO Position on Enforcement Discretion Related to Pet Food Label Modernization Changes](#)
- [NASDA Action Item: Pet Food Label Modernization Enforcement Discretion for States](#)