

Model Bills and Regulations Committee Agenda

AAFCO 1800 South Oak Street, Suite 100 Champaign, IL

AAFCO 2021 Virtual Annual Meeting

August 2-4, 2021

Agenda Topics:

1. Welcome and Committee Member Introductions
2. 2021 Mid-year Meeting Minutes (approved as written on 3/5), posted on AAFCO web-site and in the Feed BIN, included in the General Session packet)
3. Committee/Work Group reports – “Flavors” work group report - Dan
4. Old Business –
5. New Business – Human Grade Pet Food Guidelines (see attachment)
6. Assignments/homework for annual meeting
7. Adjourn

ATTACHMENT

Guidelines for “Human Grade” Pet and Specialty Pet Food Claims

AAFCO recommends and supports the following guidelines for the use of the term “human grade” in the labeling of pet foods and specialty pet foods. Pet and specialty pet foods using the labeling claim “human grade” are first and foremost animal food products and subject to inspection under 21 CFR part 507. In order to substantiate that a human grade claim is truthful and not misleading, these guidelines describe how all human grade pet food products should be manufactured in accordance with the applicable human food regulations for a ready-to-eat human food.

- (1) In the AAFCO defined feed term “human grade”, the use of the term “human grade” is only acceptable in reference to the product as a whole. The feed term specifies that every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and those applicable federal human food laws as required by ingredient, process and/or facility type.
- (2) All facilities that process or package a final “human grade” pet food product that is considered

ready-to-eat must be registered as both an FDA food facility and an FDA feed facility.
It shall be the manufacturing firm's responsibility to ensure it is able to manufacture in a human food facility and be licensed/registered and inspected by the authorized agency for human food production. Human Grade Pet Food claims are voluntary, and as such, no feed control official, neither state nor federal, can mandate that a human food authority license a facility that is only manufacturing a pet food product.

- (3) The firm must maintain written procedures to help ensure “human grade” products are stored, transported, and handled throughout the distribution channel in a manner that maintains the product’s “human grade” status.
- (4) In order to substantiate that a “human grade” pet food claim is truthful and not misleading on products under the federal authority of FDA for human food production and subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation sufficient to show that:
 - a. All individual ingredients supplied to the manufacturer that are further utilized in the manufacture of human grade pet food, are fit for human consumption;
 - b. Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and the final product is considered ready-to-eat;
 - c. The manufacturing facility is licensed to produce human food by all appropriate/required authorities.
- (5) In order to substantiate that a “human grade” pet food claim is truthful and not misleading, on products that are under the federal authority of an agency other than FDA for human food production (e.g., USDA FSIS):
 - a. Where final processing (i.e., mixing, blending) and/or packaging occurs in a registered FDA Human Food Facility subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation sufficient to verify that:
 - i. The product is ready-to-eat with all included ingredients processed, packed, held and shipped in compliance with the applicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging;
 - ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food;
 - iii. The FDA facility that processes and/or packs the “Human Grade” Pet Food is

licensed to produce human food by all appropriate/required authorities.

- b. Where final processing (i.e., mixing, blending) and/or packaging occurs in a non-FDA food facility producing human food (e.g. slaughter plant), the firm must maintain and make available upon request, documentation sufficient to verify that:
 - i. The product is ready-to-eat with all included ingredients processed, packed, held and shipped in compliance with the applicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging; All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food;
 - ii. The processing and/or packing of the final product is conducted in an area/room identified within the facilities required HACCP/Food Safety Plan as an area/room dedicated to the blending, packaging, repackaging and/or labeling of an edible ready-to-eat food;
 - iii. The non-FDA facility that processes and/or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.

(6) The manufacturer of a pet food or specialty pet food product with “human grade” claims must ensure:

- a. It is clearly labeled for its intended use as animal food, such as “dog food” or “cat treats”;
- b. No statements of quality or grade appear in the ingredient statement [PF5(d)(3)];
- c. The largest or most prominent use of the term “human grade” on each panel of the label and any labeling (brochures, point of sale materials, websites, etc.) must be juxtaposed with the statement of intended use (e.g. human grade dog food or human grade cat treats), in the same style, color print, and type size as the term “human grade”.
- d. A claim of “human grade ingredients” is only acceptable if the product as a whole meets the requirements of the “human grade” pet food term; and
- e. The label is in compliance with all applicable labeling rules, including any voluntary labeling allowed under participation in the Agriculture Marketing Service Process Verified Program.