

AAFCO Standard for “Human Grade” Pet Food

AAFCO developed the following standard for making “human grade” pet food claims on pet food and specialty pet food labeling. This standard must be met when applying under the USDA Agriculture Marketing Service (AMS) [Process Verified Program \(PVP\)](#).

- (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 all other applicable federal human food law as required by ingredient, process and/or facility type.
 - a. A claim regarding “human grade ingredients” is only acceptable if the product as a whole is “human grade.”
 - b. Every use of the term “human grade” must be coupled with the statement of intended use (e.g. human grade dog food or human grade cat treats).
- (2) It shall be the manufacturing firm’s responsibility to ensure it is able to manufacture in a human food facility and be licensed 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.
 - a. 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 animal food facility and an FDA human food facility.
- (3) A 21 CFR part 117 GMP equivalency audit shall be conducted annually by Agriculture Marketing Service through the Process Verified Program unless the facility has been inspected for compliance by an agency with enforcement authority with applicable food safety regulations within the last year.
- (4) The firm must maintain written procedures to ensure “human grade” products are stored, transported, and handled throughout the distribution channel in a manner that maintains the product’s “human grade” status.
- (5) In order to substantiate that a “human grade” pet food claim is truthful and not misleading on products manufactured in an FDA Human Food Facility 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; and

(6) In order to substantiate that a “human grade” pet food claim is truthful and not misleading, on products that are/contain ingredients traditionally under the federal authority of an agency other than FDA (e.g., USDA FSIS), where final processing or packing occurs in:

- a. 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. All included ingredients were processed, packed, held and shipped in compliance with the applicable federal regulations for the manufacture of human foods and the final product is considered ready-to-eat.
 - ii. All non-FDA registered facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food; and
 - iii. The FDA facility that processes or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.

or;

- b. 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. All included ingredients were processed, packed, held and shipped in compliance with the applicable federal regulations for the manufacture of human foods and the final product is considered ready-to-eat.
 - ii. All non-FDA registered facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food;

- iii. The processing or packing of the “Human Grade” Pet Food 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 a ready-to-eat food; and
- iv. The non-FDA facility that processes or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.

(7) 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, and each use of “human grade” must be coupled with the statement of intended use such as “human grade dog food” or “human grade cat treats”.
- b. No statements of quality or grade appear in the ingredient statement [PF5(d)(3)];
- c. All uses of the words “human grade” pet food on the label are in a type size no larger than that of the statement of intended use, as required by PF2(a)(2);
- 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;
- e. Requirements (7) a & c noted above are applied to all forms of labeling (brochures, point of sale materials, websites, etc.) where the term “human grade pet food” is utilized; and
- f. 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.