

## **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 register with FDA as a food facility operating under both General Product Categories (Food for Human Consumption & Food for Animal Consumption) as found in Section 9a of the U.S. Food and Drug Administration Food Facility Registration.  
*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 (e.g., affidavits) 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 (e.g., affidavits) 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.

- ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food.
- iii. The processing and/or packing of the final product is conducted in an area/room identified within the facility's required HACCP/Food Safety Plan as an area/room that can be used for the blending, packaging, repackaging and/or labeling of an edible ready-to-eat food.
- iv. 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.



# PET FOOD COMMITTEE

~ Mid-Year Meeting, 2022 ~

# HOUSEKEEPING

- The meeting is being recorded.
- Questions and comments will be addressed after each agenda item and at the end of the meeting.
- To comment or ask a question use the 'Chat' or the 'Raise Hand' option.
- Melissa Kunze will monitor the Chat and Kristin Green will take minutes for the meeting.

# AGENDA

- PFC Welcome and Updates 1:15 – 1:25
- Work Group Reports:
- Human Grade Guidelines Report – G. Ferguson/A. Therrell 1:25 – 1:45
- Copper Work Group Update – Dr. Burkholder 1:45 – 2:05
- PFLM 2:05 – 2:45
  - Work Group Updates
  - Implementation Work Group Update – Stan Cook
  - Market Survey Panels
- Training and Outreach Sub-Committee - Chris Berg 2:45 – 3:00
  - Pet Food Forum/Pet Food Training Modules – Sue Hayes/Liz Beckman
  - AAFCO Talks Website – Liz Beckman

# AGENDA

- PFC Welcome and Updates
- Welcome New Additions to PFC
  - Matt Frederking – National Grain & Feed Association Advisor
  - Tim Law - North American Renders Association, Alt. Advisor
  - Roger Hoestenbach - American Pet Products Association, Advisor
  - Barbara Jean Schliecher – Kansas Department of Agriculture, Member
  - Darrell Johnson – Kentucky Regulatory Services, Member/PFC Liason

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1:45-1:50

- Work Group Reports:

Human Grade Guidelines Report – G. Ferguson/A. Therrell 1:15 – 1:25



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- Copper Work Group – Update – Dr. Burkholder 1:45 – 2:05

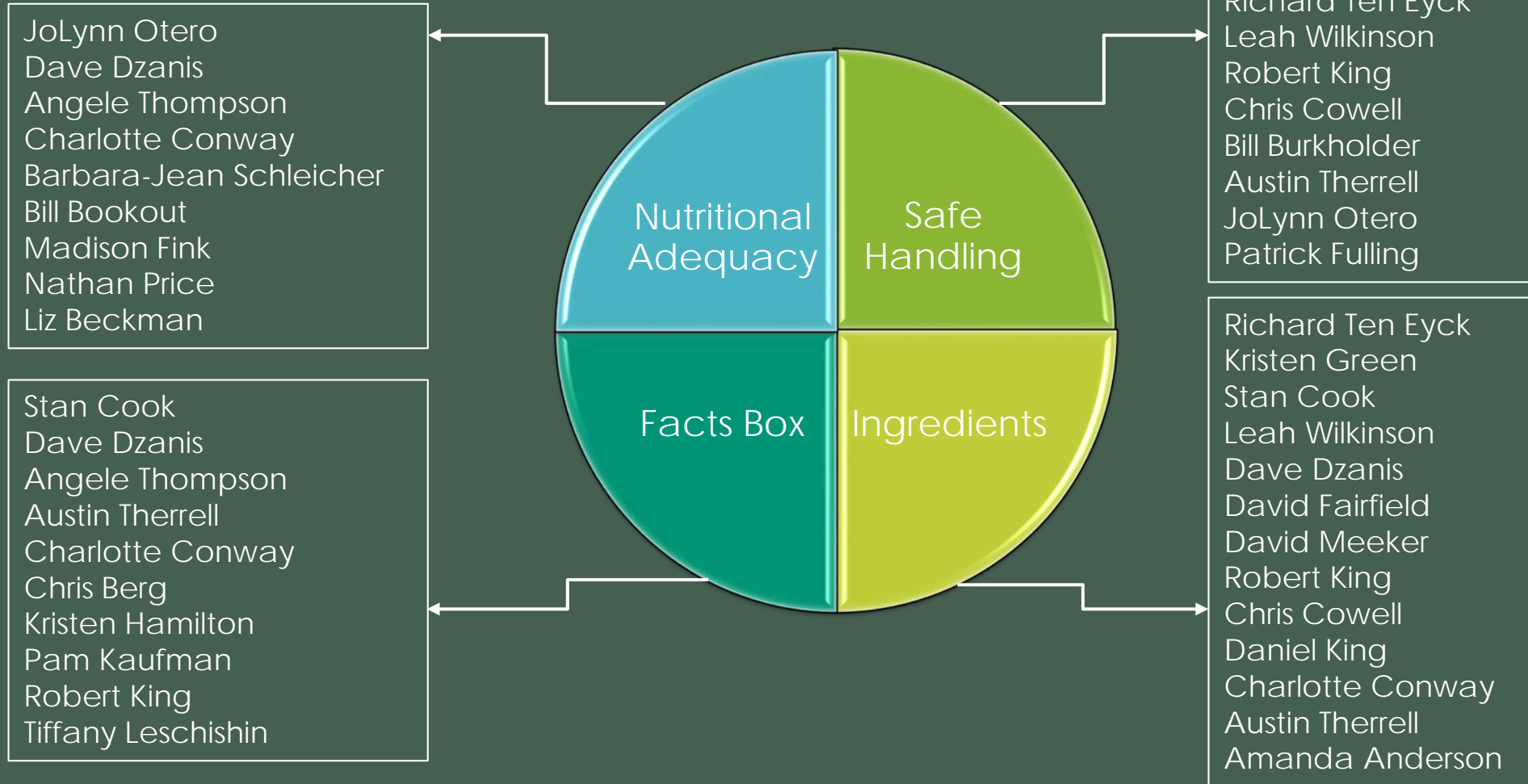
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  - Work Group Updates

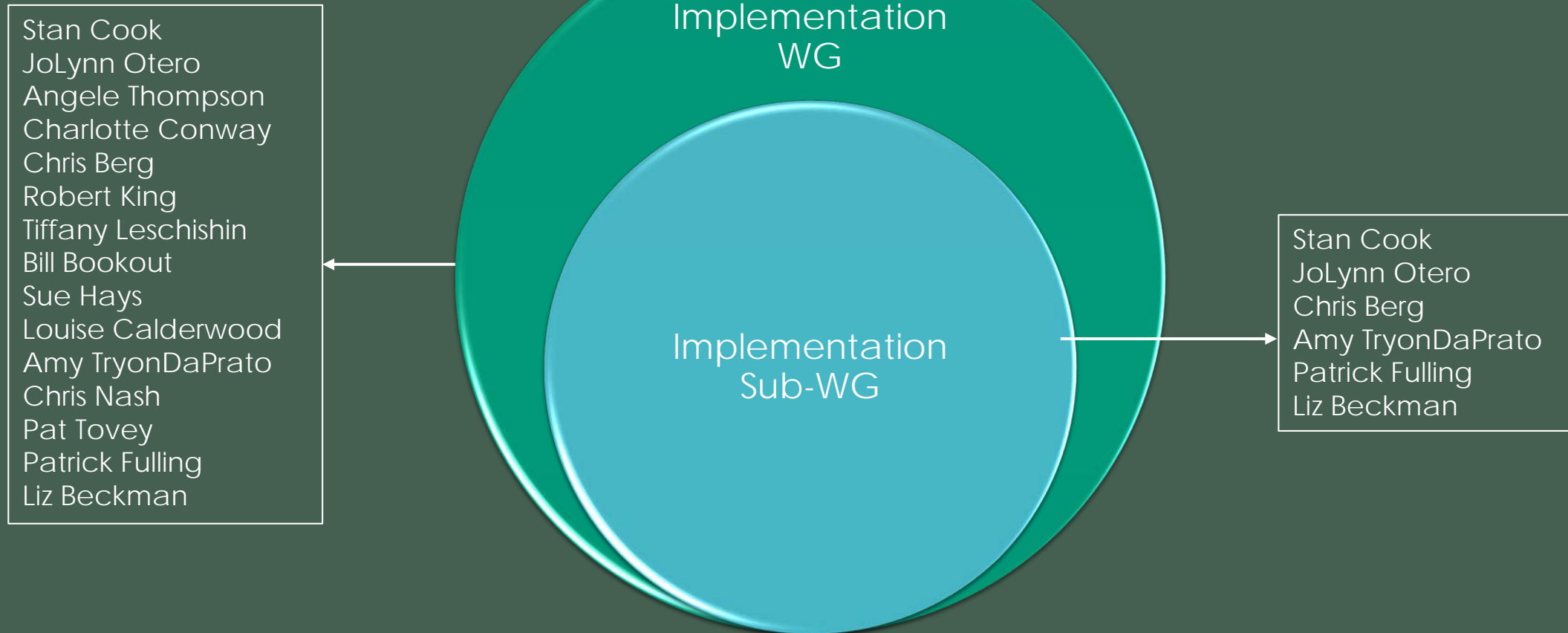
# The Road to Implementing PFLM



# PFLM Work Groups



# Implementation Work Groups



# PFLM Work Groups

- Ingredients
- Safe Handling
- Nutritional Adequacy
- Nutrition Facts Box

# PFLM Work Groups – Ingredients and Safe Handling

- Language is final and consensus with members on group.
- Reports to be accepted and voted on together when all language is final by PFC.

# PFLM Work Groups – Facts Box and Nutritional Adequacy

- Combined meetings for these 2 work groups have been meeting weekly since October of 2021.
- The Facts Box work group is close to having consensus. First draft of language has been developed.
- The Nutritional Adequacy work group is working through modification of graphics or alternate concepts to the graphics.
  - Market research will be needed to confirm whether alternate concepts are acceptable for consumers.



## Pet Nutrition Facts

1 cup (8 oz standard measuring cup)= xxx g

Calories per cup (calculated) xxx

From: Protein xx, Fat xx, Carbohydrate xx

Nutrients	Guaranteed	per cup
Protein (min)	xx%	xx g
Fat (min)	xx%	xx g
Total Carbohydrate (max)	xx%	xx g
Dietary Fiber (max)	xx%	xx g
Moisture (max)	xx%	xx g

(Name of product) is formulated to meet the nutritional levels established by the AAFCO Dog (or Cat) Food Nutrient Profiles for \_\_\_\_\_.

## Pet Nutrition Facts

1 cup (8 oz standard measuring cup)= XXX g

Calories per cup (calculated) XXX

From: Protein XX, Fat XX, Carbohydrate XX

Nutrients	Guaranteed	per cup
Protein (min)	X %	X g
Fat (min)	X %	X g
Fat (max)	X %	X g
Total Carbohydrate (max)	X %	X g
Dietary Fiber (max)	X %	X g
Dietary Starch (max)	X %	X g
Sugars (max)	X %	X g
Moisture (max)	X %	X g
Ash (max)	X %	X g
Vitamin E (min)	X U/kg	X IU
Ascorbic acid* (min)	X mg/kg	X mg

\*Not recognized as an essential nutrient by the AAFCO Dog Food Nutrient Profiles.

[Explanation of enzyme units]

This diet is formulated to meet the nutritional levels established by the AAFCO Dog Food Nutrient Profiles for growth including growth of large size dogs (70 lb. or more as an adult).

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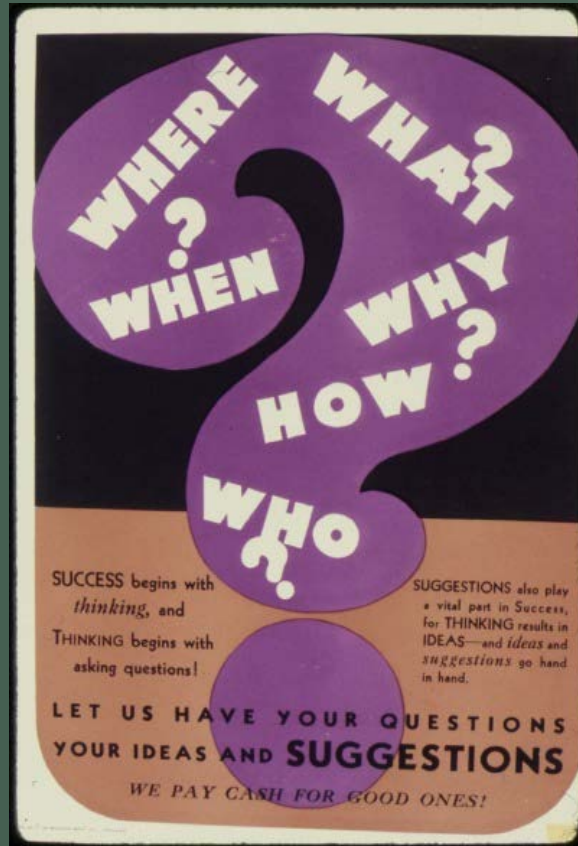
# PFLM Implementation Work Group Update

- State Survey
  - Provided document to states about history of PFLM, where we are now, and planning ahead.
  - Analyze survey by similarities of processes by states.
  - Develop models/best management practices for regulatory adoption for each process type.
- Provide Industry and Regulatory Fiscal Impact information

## PFLM Implementation Work Group Update **Cont.**

- 50 State Webinar Calls – to educate regulators of rule changes and develop dialogue of state needs.
  - Dialogue includes length of time states will employ regulatory discretion
  - Re-Survey of states to validate education steps
- Develop and provide education materials for industry, states, consumers.
- Develop timeline of estimated state adoption of the regulations.

# Survey: the Why, what, when, where



\* 1. What state do you work for?

\* 2. Does your position or agency regulate pet food?

☐ Yes

☐ No

Prev

Next

# Evaluate results of Survey



# Develop Models / BMPs



# Industry fiscal impact

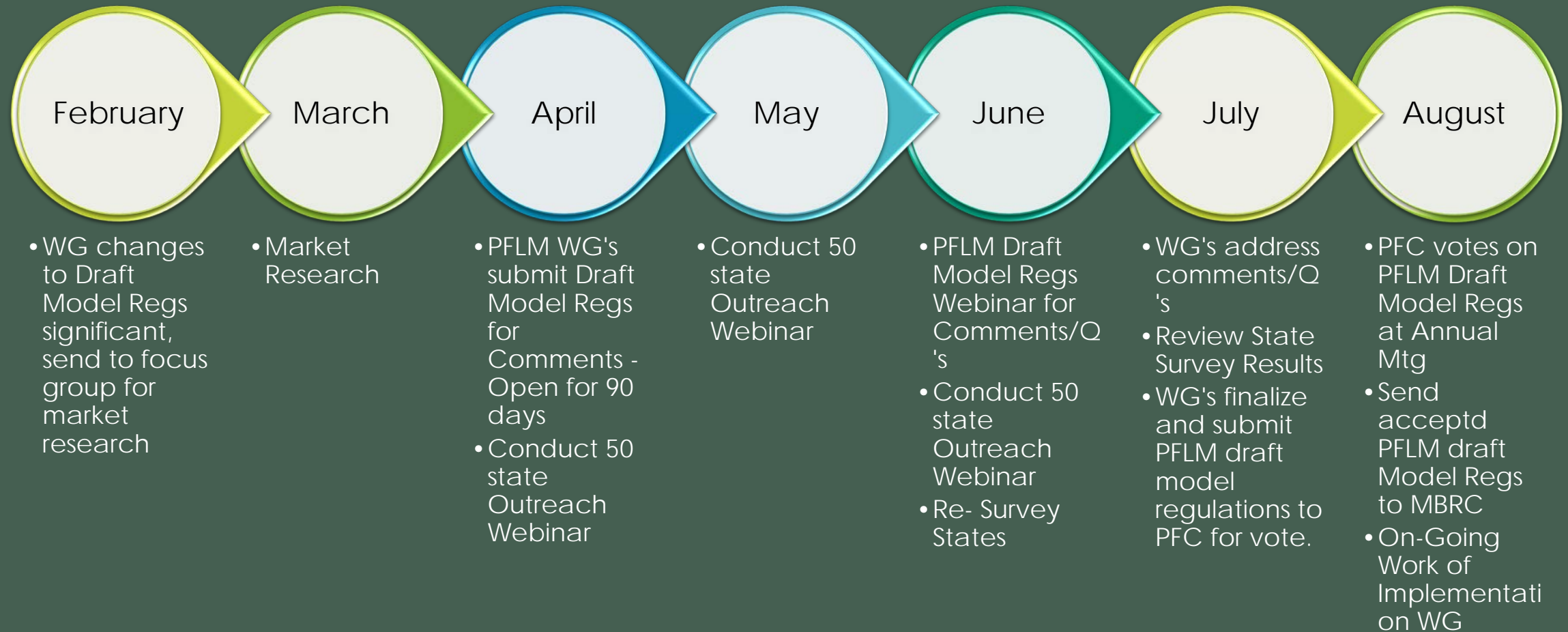




# PFLM Implementation WG Timeline

- Goal will be to create a timeline for state adoption.
- The timeline will be posted to PFC website.
- Work is in progress, PFC will try to keep the process as transparent as we can.
- Questions?

# Current PFLM (all work groups) Approximate Timeline for 2022



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# Training

- Basic Pet Food Labeling Workshop/Modules
  - Instructional Designer
- Advanced Pet Food Labeling Workshop/Modules
- Evaluating Pet Food Label Workshop/Module
- Pet/Specialty Pet Food labeling Guide
- Pet Food Forum Update- Sue Hayes

# Outreach

- Reviewing the Pet Food Checklist in OP
- Visit Trade Shows
- AAFCO Talks Website – Liz
- Business of Pet Food - Liz

# Come Join Pet Food Training and Outreach Sub-Committee

- Do you have interest in organizing and implementing trainings?
- Can you create, update, and edit outreach material?
- Are you a Subject matter expert on Pet food topics?



- We meet every other month to get updates on the projects.
  - Training modules
  - Outreach documents
  - Website updates

Contact:  
Chris Berg  
Phone: 515-281-8603  
Email: [chris.berg@iowaagriculture.gov](mailto:chris.berg@iowaagriculture.gov)



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**\*9.77 \_\_\_\_\_ Stock/Broth** is obtained by cooking mammalian or poultry bones, parts, and/or muscle tissue. The crude protein content of stock/broth must be no less than 90% on a dry matter basis. In order for the stock/broth to be labeled as such, the moisture to crude protein ratio must not exceed 135:1 (135 parts water to 1 part crude protein). The product must bear a name descriptive of its kind, composition or origin, such as, but not limited to, meat, beef, pork, poultry, chicken, turkey: and may be called either stock or broth. (Proposed 1997, Amended 2001, Adopted 2002)

- (c) An ingredient or combination of ingredients may form part of a brand or product name of a pet food or specialty pet food:
  - (1) When the named ingredient(s) constitutes at least 95% of the total weight of the product. Water sufficient for processing may be excluded when calculating the percentage; however, the named ingredients shall constitute at least 70% of the total product weight.





**AAFCO**<sup>®</sup>  
Association of American Feed Control Officials

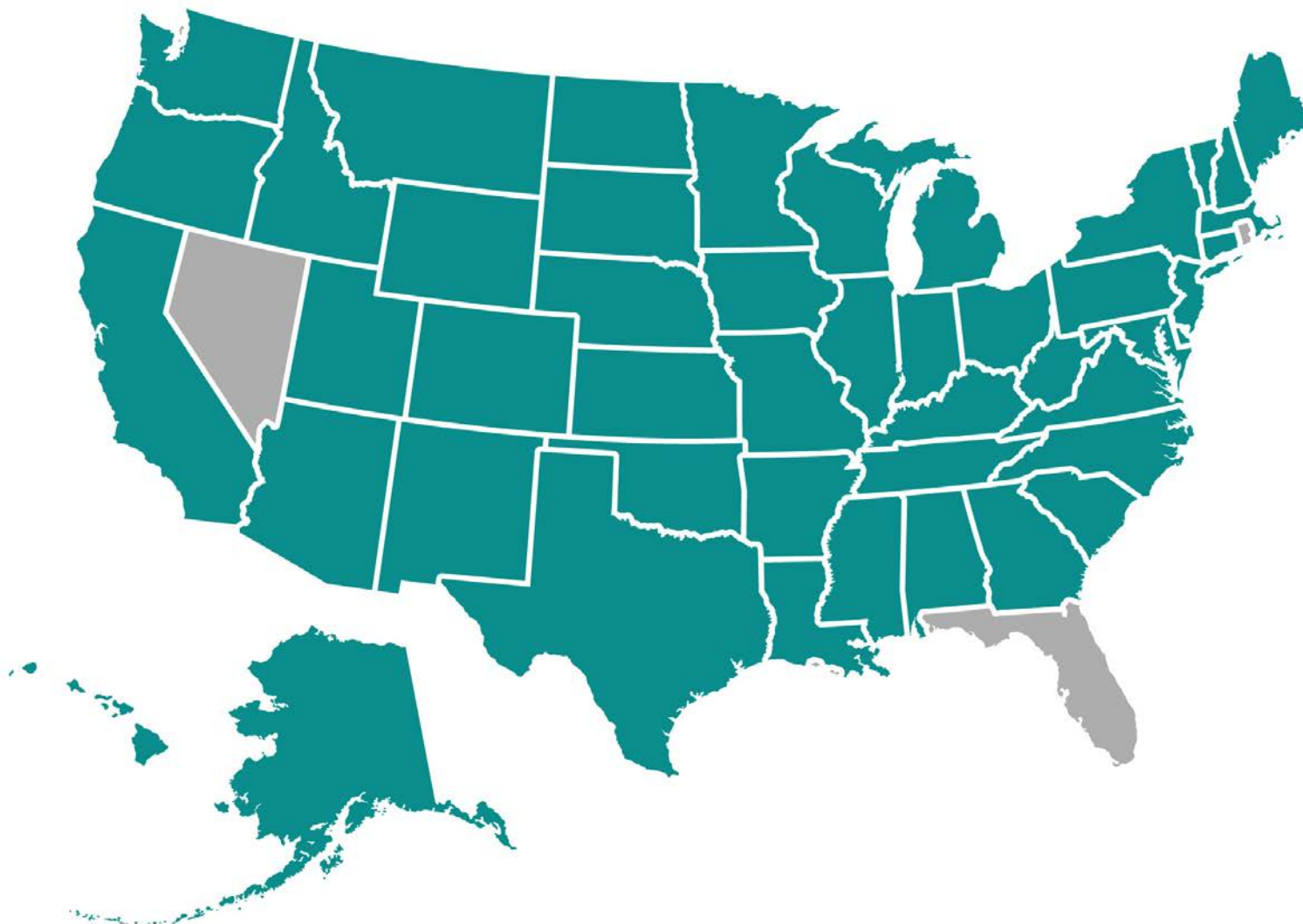
# Pet Food Label Modernization

## State Implementation Survey Results

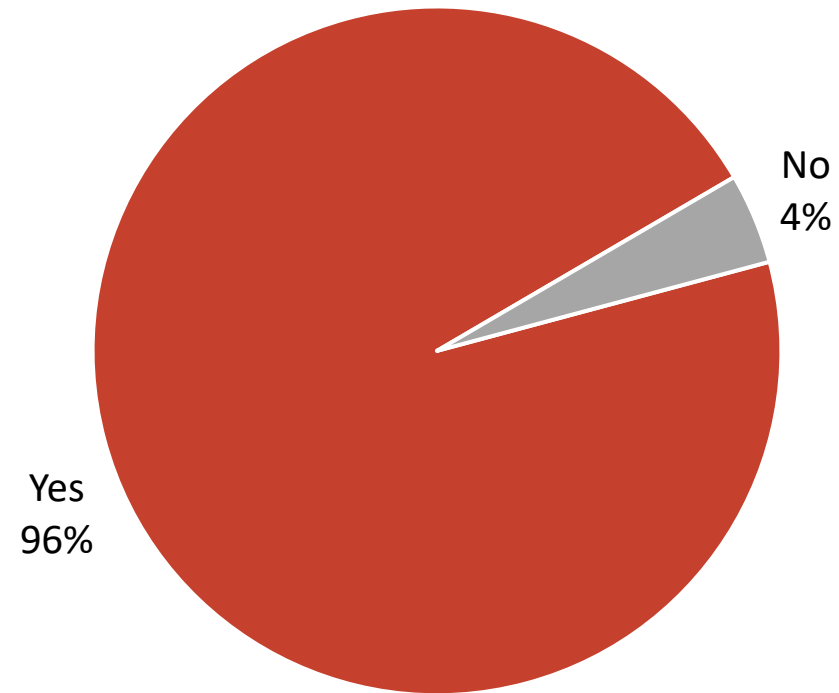




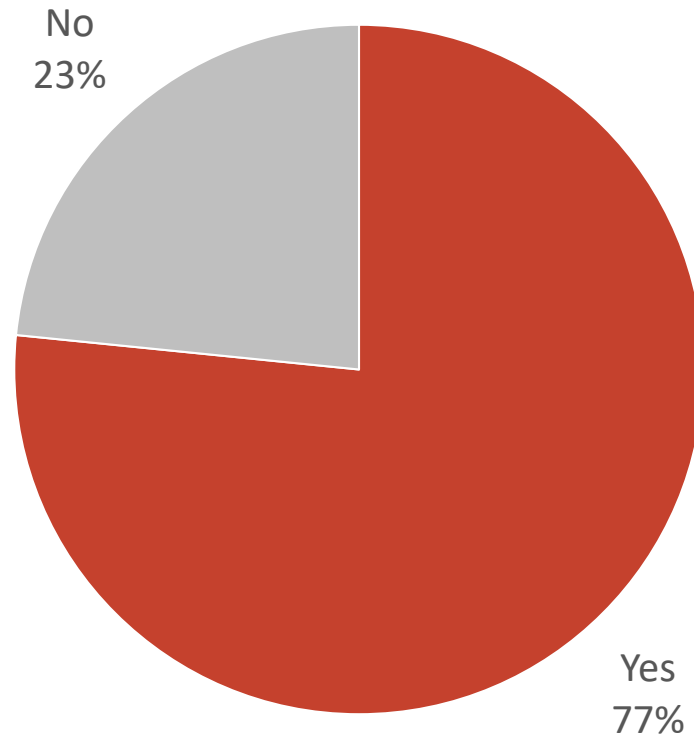
States that participated:



Survey respondent or their agency regulates pet food:

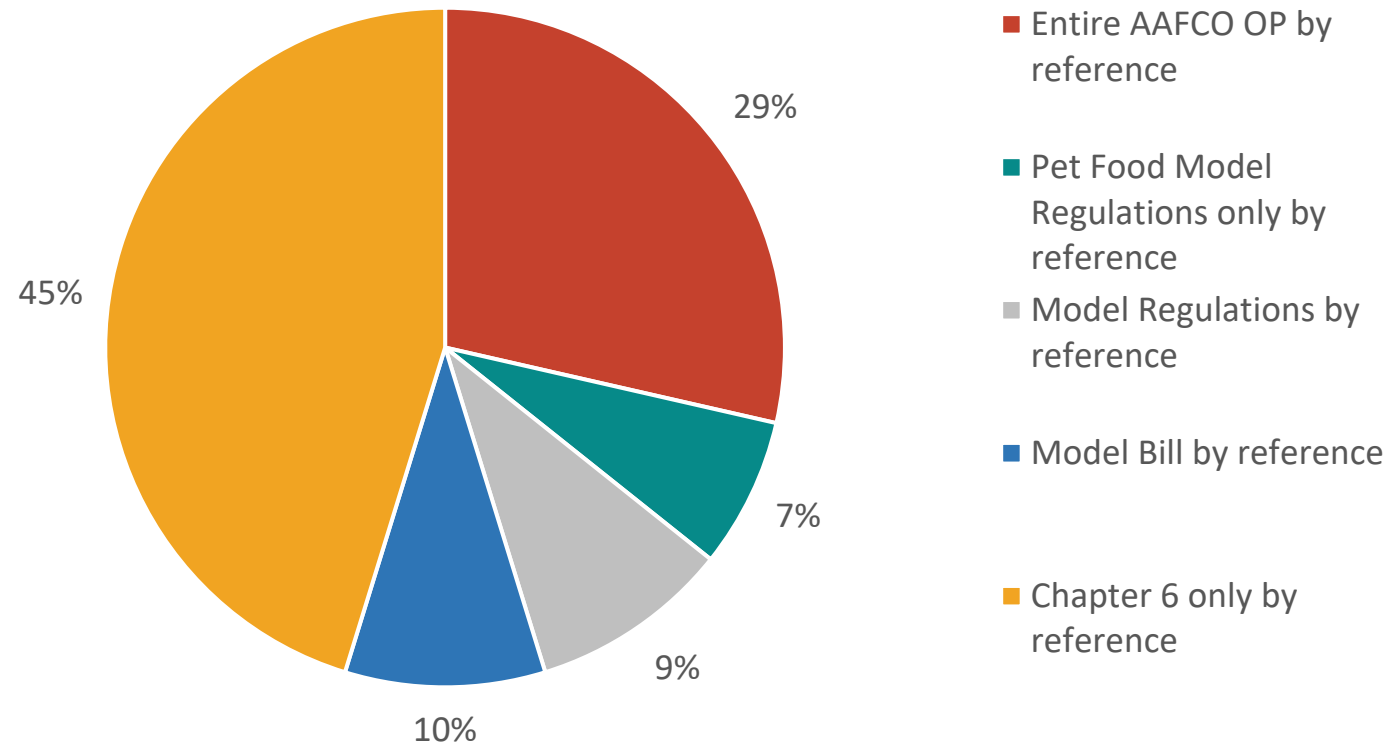


States that adopt some part of AAFCO OP by reference:



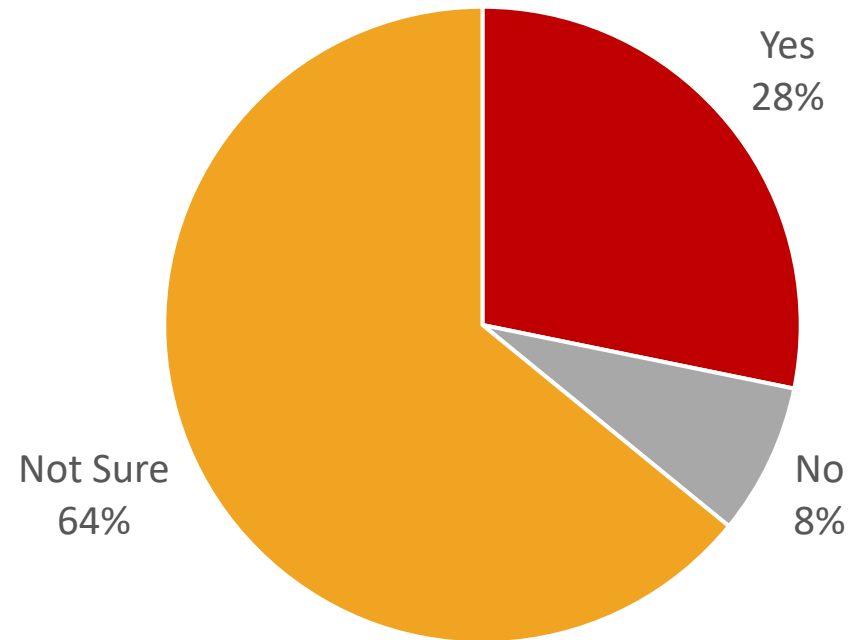


# States adopt the following by reference:



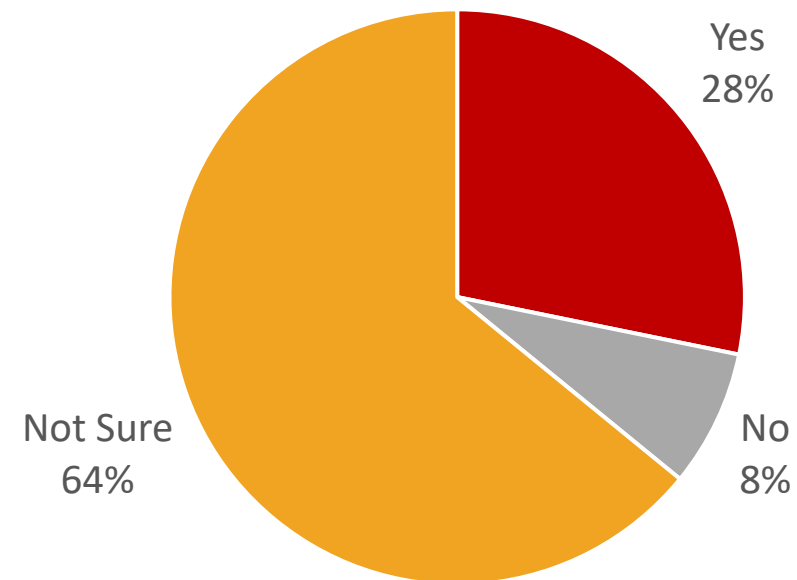
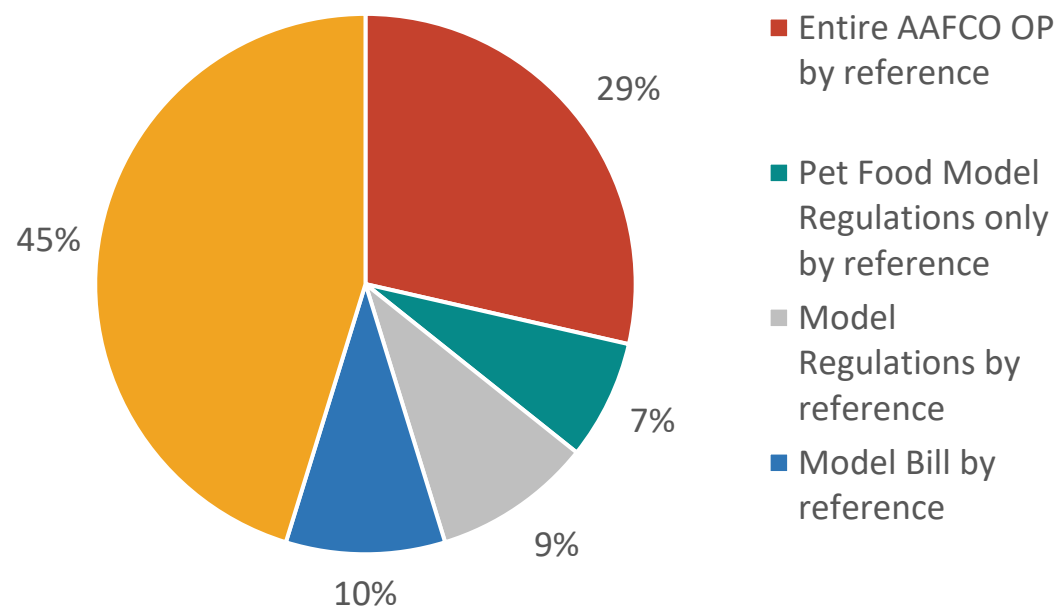


# States plans to enact the regulation changes proposed in the PFLM Model Regulations:





# What does this mean?



# Reasons why states may not enact the regulation changes:

- Agency does not regulate pet food
- State develops its own language rather than use AAFCO's
- Does not have budget to support regulation updates
- Does not see a need to prioritize regulation updates
- Wants to wait and see what neighboring states will adopt
- State does not currently have labeling rules

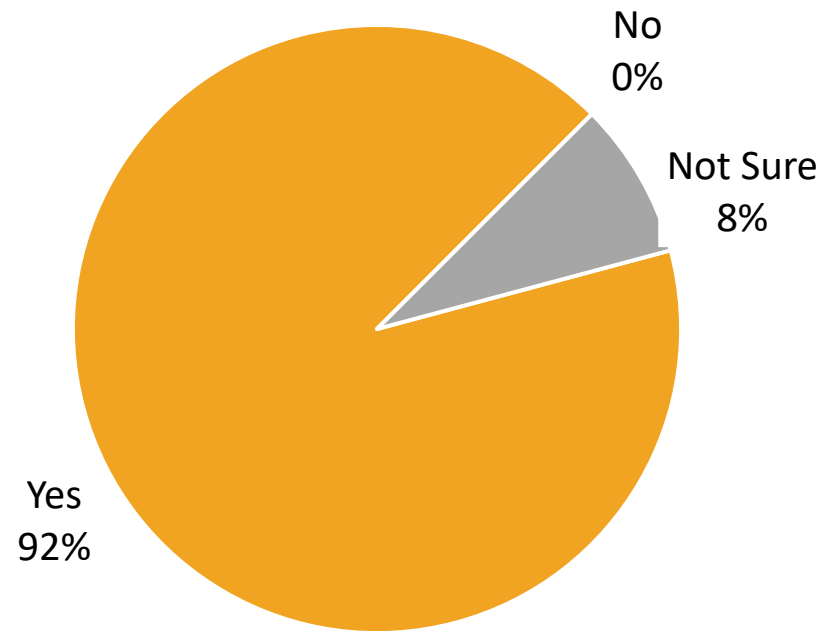


# Who manages the rule-making process:

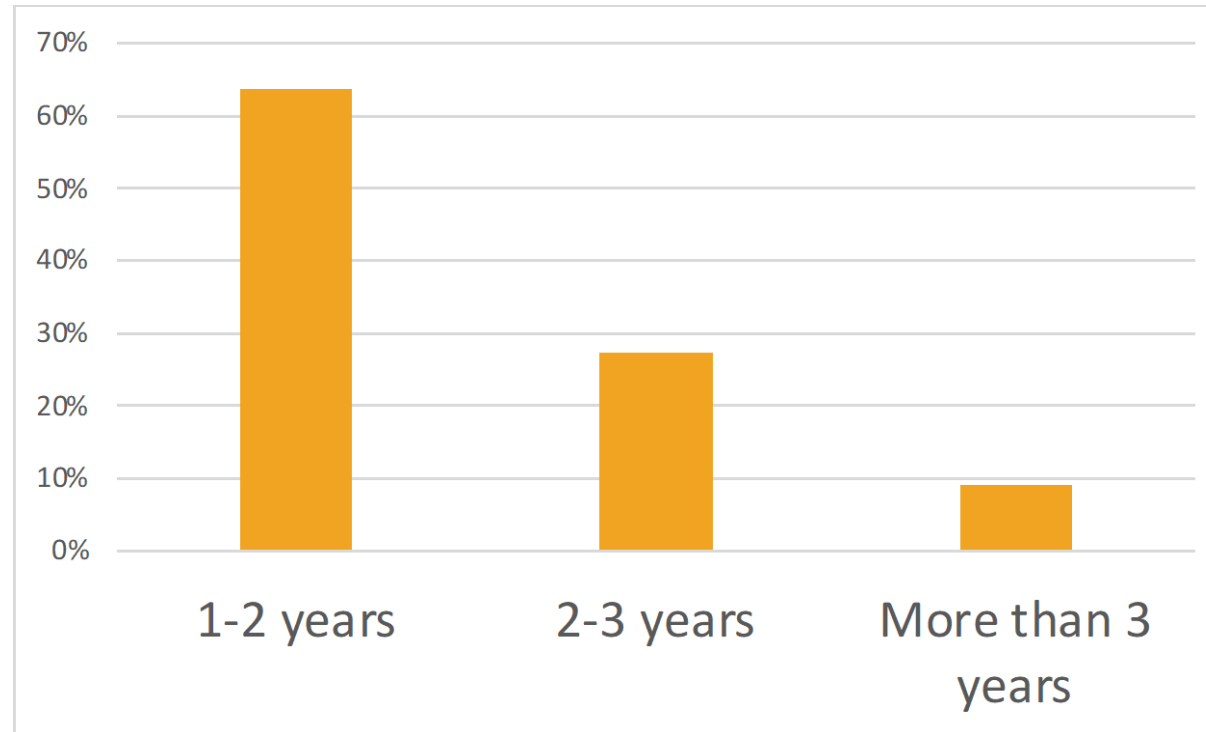




# States utilizing regulatory discretion during the transition period:

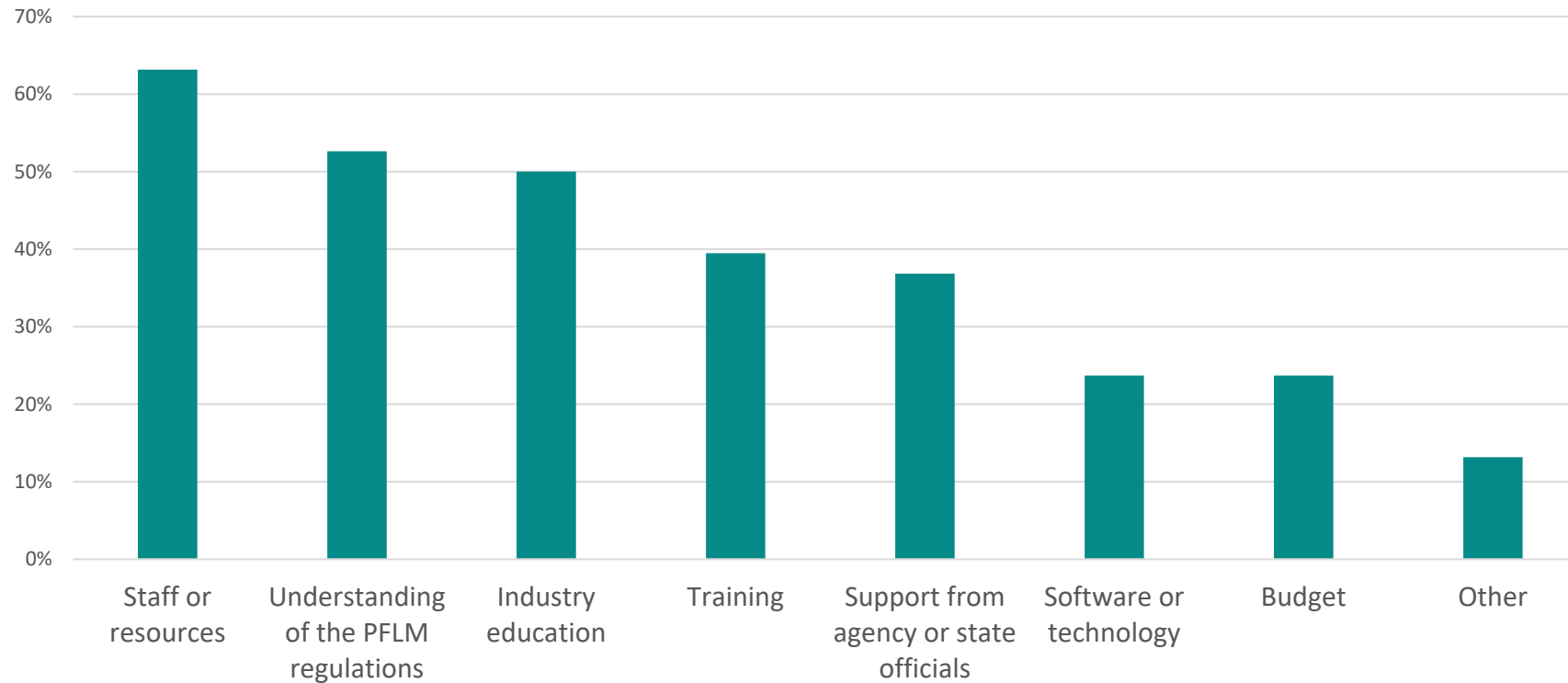


# Average regulatory discretion timeframe:





# Obstacles or roadblocks when enacting the PFLM regulations:





# State needs from AAFCO to enact the PFLM regulations:

