

Pet Food Webinars | Part 1

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Introductions

Marissa Cohen, NC State

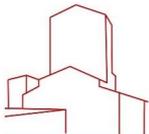
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Marissa Cohen



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FOOD SAFETY-ANIMAL FOOD & FEED RULE



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What we will not be addressing

- How to create products
- Nutritional requirements

This series is meant to give brief overviews of the regulatory requirements for creating and selling pet food products.

Though we have limited time during the webinars to address specifics and questions, we are all more than happy to answer questions on an individual basis.



Housekeeping

- Webinars will be recorded
- Utilize the Q&A feature
- If you have any questions after the webinars, please reach out to us
- Information will be specific to North Carolina regulatory requirements



Agenda

- Introduction to pet food and regulations
- Using processing by-products to create pet food and treats
- Registration Overview
- Labeling
- Q&A

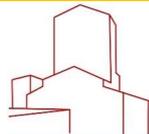


What is pet food?

Pet food is defined as **any commercial (i.e. you offer for sale, sell, exchange or barter) feed prepared and distributed for consumption by dogs or cats. (AAFCO)**

Can include:

- Complete and balanced foods,
- Treats/snacks,
- Nutrient supplements,
- Nutrient-added water, and
- Edible chews (rawhides, hooves, pizzles/bully sticks)



What is pet food?

Commercial feed or pet food includes food sold:

- At the local farmer's market,
- Over the internet,
- At a veterinarian's office, or
- In a local store. (AAFCO)



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Who regulates pet food?

- The Association of American Feed Control Officials (AAFCO) does not regulate pet food.
- Pet food is regulated at the federal and state levels by the FDA and state departments of agriculture.
- In North Carolina, the NCDA&CS conducts many of the FDA inspections of animal food facilities on behalf of the FDA.
 - ❑ This enhances the relationship facilities have with their local regulatory agency.



Regulations

- The regulations a producer has to comply with ultimately depends on the size and location of their business, and extent of distribution of products.
 - Home-based operation
 - Shared/Commercial kitchen
 - Large-scale production



Regulations

- It is the responsibility of each facility to determine which rules/regulations apply.
- We (NC State Extension) can give guidance, but many of the regulations depend on business size.



Record Keeping

- Doesn't need to be complicated
- Have written/typed SOPs for each procedure as well as recipes for each product
 - ❑ This is especially helpful if you have to develop a food safety plan or plan to expand in the future
- Lot coding can be very helpful during a recall
 - ❑ Can be as simple as the manufacture or expiration date
 - Can limit the scope of a potential recall
- Training records, if required



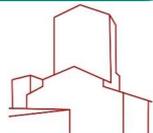
Marketing and label claims

- Not just limited to what is on the label or packaging.
- Includes websites and social media
 - ❑ A firm may receive a warning letter from FDA if they are making “drug” claims for non-medicated food or ingredients on their website or social media.
 - ❑ If the packaging says to cook the diet to 165°F, but the website talks about the benefits of feeding raw diets



Sustainability

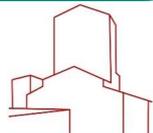
- How?
 - Use of by-products from human food industries
 - Use of non-edible products
 - *“Approximately 90% of what beef cattle eat is not in competition with the human food supply” (Randy Stuewe, Darling Ingredients)*
 - Approximately 30% of poultry is considered non-edible in western diets



Definitions

- By-products: “Secondary products produced in addition to the principal product” (AAFCO)

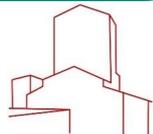
Ingredient definitions are available in the AAFCO Online Ingredient Database (Subscription required)



Examples of by-products

Tongue	Heart	Esophagus	Lungs	Spleen	Kidneys	Brain*	Livers
Blood	Bone	Stomachs	Intestines <small>(free of contents)</small>	Poultry necks	Poultry feet	Poultry undeveloped eggs	Poultry viscera
Poultry whole carcasses	Poultry hatchery by-product	Dried meat solubles	Poultry heads	Hydrolyzed poultry feathers	Meat meal	Meat and bone meal	Hydrolyzed hair
Egg shell meal	Blood meal	Bone marrow	Stock/broth				

This list is not exhaustive and is meant to show examples of by-products that can be used or created by AAFCO definition.

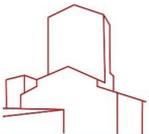


Summary

- A facility may be subject to one or more regulation depending on their business size.
- Record-keeping is an integral component of a good food safety system.
- Marketing claims made online may be subject to review and inspection.
- There are a number of by-products that can be used to create pet food/treats



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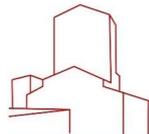


Q&A

Please add your questions to the Q&A box.

We will answer questions until we run out of time!

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Value-Addition of Agricultural and Meat By-products

Michael Joseph, Ph.D.

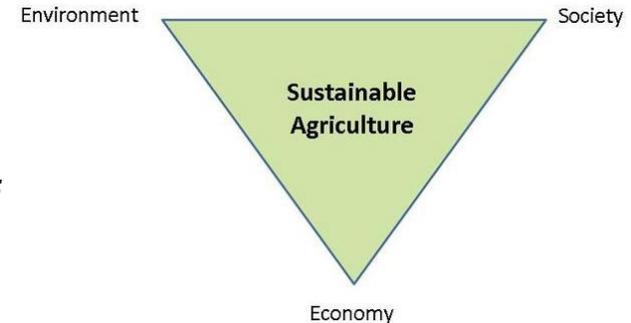
Assistant Professor and Extension Specialist

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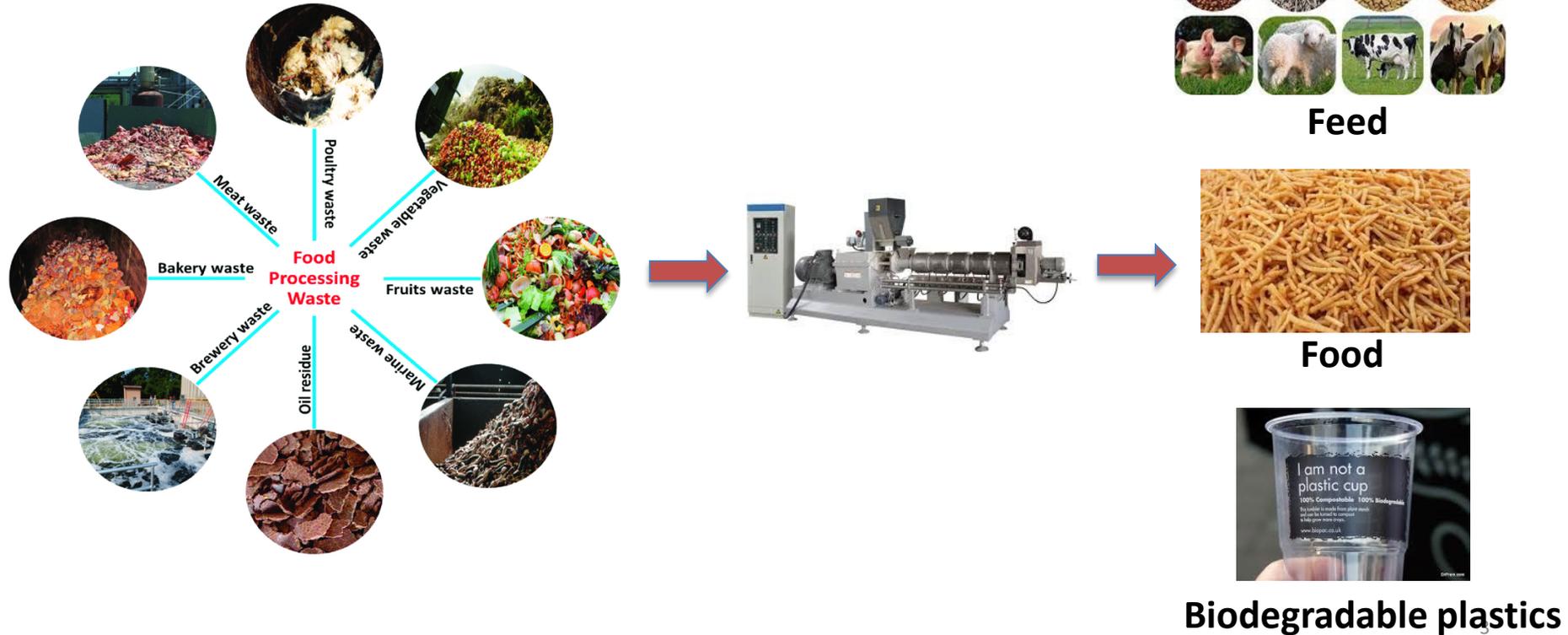
Value-addition promotes sustainability and economic opportunities

- Importance is given to maximizing production – agriculture and meat
- By-products are generated in the process
- By-product generation creates problems in areas of environmental protection and sustainability
- Lack of by-product management adds to the cost of disposal
- By-products contain valuable nutrients
- Value-addition improves utilization of these nutrient sources
- Promotes sustainability by integrating environmental health, economic profitability and social equity

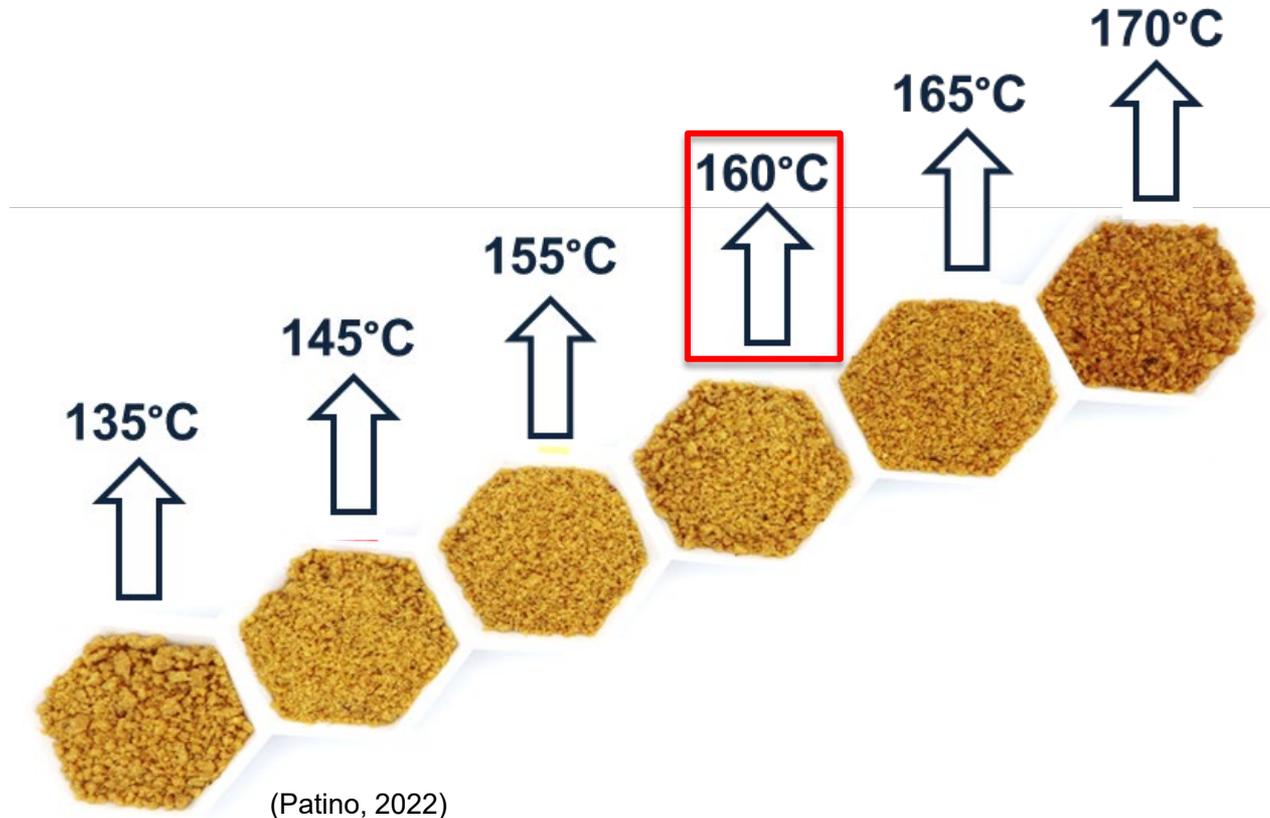


Source: Brodt et al., 2011

Value Addition Prospects



Full-fat soybean meal extrusion at different temperatures



Full fat high oleic

Full fat normal oleic

Extruded expelled normal oleic

Solvent extracted normal oleic



(Patino, 2022)

Salmon skins



Salmon trimmings



Oil



Oil

Inert larval diets



35 days post hatch = Fish



Artemia



Inert diets

FACILITY REGISTRATI ON AND INSPECTION

Jessica E. Gore

NCDA&CS, Food & Drug Protection
Division, Animal Feed Program





OBJECTIVES

- State Facility Registration
- Facility Inspections

WHY ARE FACILITIES EXPECTED TO REGISTER?

The short answer: compliance with state and/or federal regulations.

Facility registration provides the appropriate regulatory agency with the necessary information about a given facility's operations to effectively enforce animal food safety regulations.

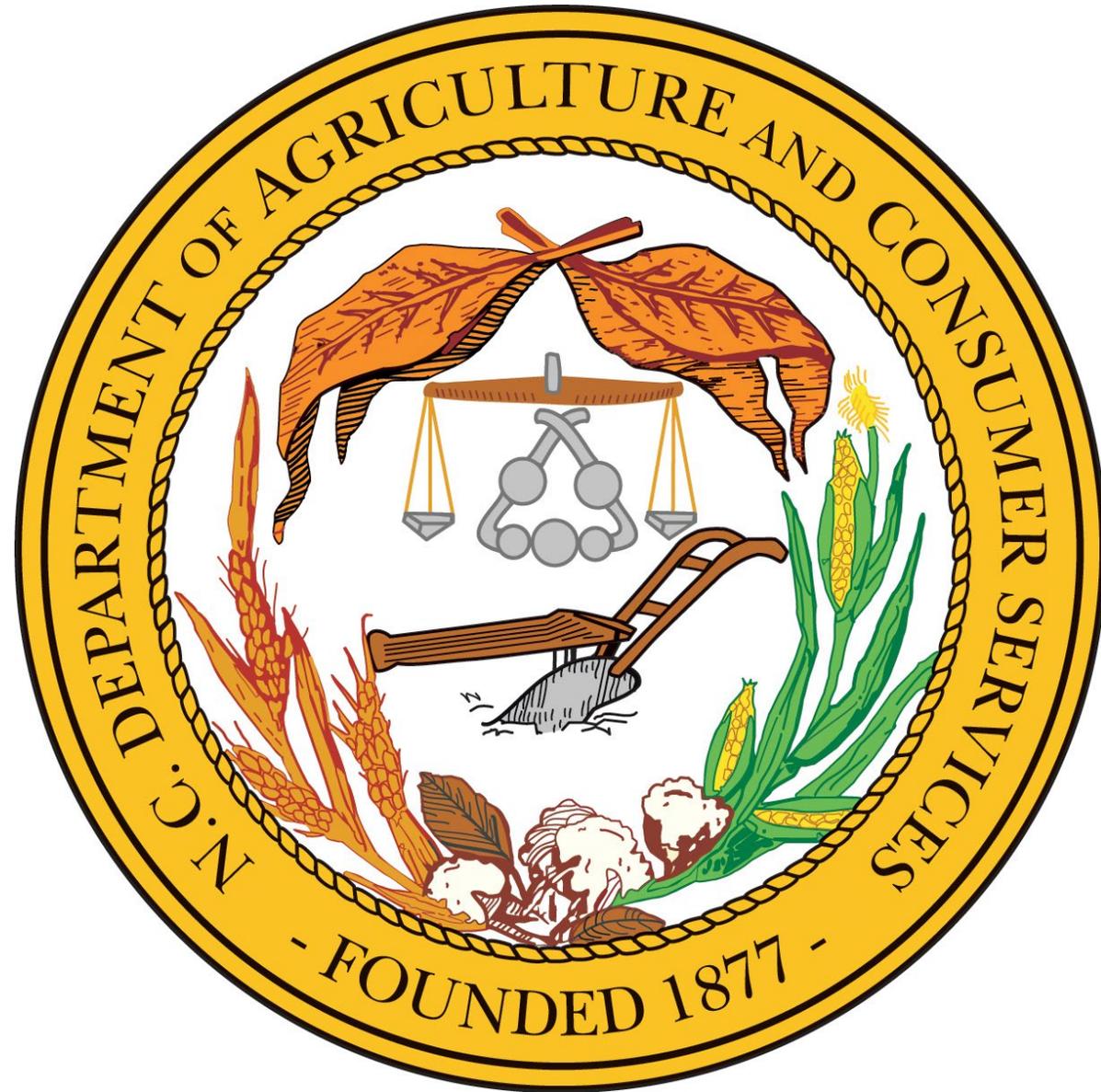


STATE REGISTRATION

NORTH CAROLINA COMMERCIAL FEED LAW OF
1973

§106-284.34. REGISTRATION.

(A) NO PERSON SHALL MANUFACTURE OR
DISTRIBUTE A COMMERCIAL FEED IN THIS
STATE, UNLESS HE HAS FILED WITH THE
COMMISSIONER ON FORMS PROVIDED BY THE
COMMISSIONER, HIS NAME, PLACE OF
BUSINESS, AND LOCATION OF EACH
MANUFACTURING FACILITY IN THIS STATE, IF
ANY, AND MADE APPLICATION TO THE
COMMISSIONER FOR A PERMIT TO REPORT THE
QUANTITY OF COMMERCIAL FEED
DISTRIBUTED IN THIS STATE.



FACILITY INSPECTIONS

FACILITIES ARE SUBJECT TO INSPECTION FOR COMPLIANCE WITH THE NORTH CAROLINA COMMERCIAL FEED LAW AND ITS ATTENDANT REGULATIONS, AS FOUND IN THE NC ADMINISTRATIVE CODE, AT LEAST ONCE, AND THEREAFTER UPON A RISK-BASED SCHEDULE.





**THE WAY TO GET
STARTED
IS TO QUIT
TALKING AND
BEGIN DOING.**

Walt Disney



THANK YOU

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ANIMAL FEED LABELING

JUSTIN HILL

**NCDA&CS, FOOD & DRUG PROTECTION
DIVISION, ANIMAL FEED PROGRAM**



Definitions: Relative to Registration & Labeling

The term "**brand name**" means any word, name, symbol, or device, or any combination thereof, identifying the commercial feed of a distributor or registrant and distinguishing it from that of others.

The term "**product name**" means the name of the commercial feed which identifies it as to kind, class, or specific use.

The term "**label**" means a display of written, printed, or graphic matter upon or affixed to the container in which a commercial feed is distributed, or on the invoice or delivery slip with which a commercial feed is distributed.

The term "**labeling**" means all labels and other written, printed, or graphic matter (i) upon a commercial feed or any of its containers or wrapper or (ii) accompanying such commercial feed, or advertisement, brochures, posters, television and radio announcements used in promoting the sale of such commercial feed.

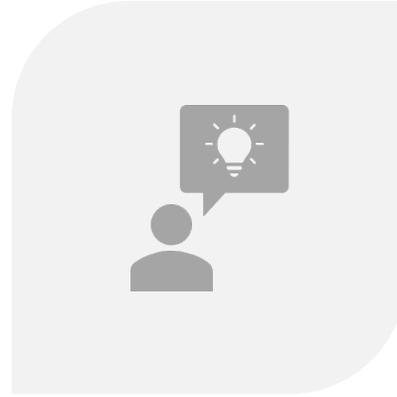
Definitions: Relative to Pet Food

The term "pet" means any domesticated animal normally maintained in or near the household(s) of the owner(s) thereof.

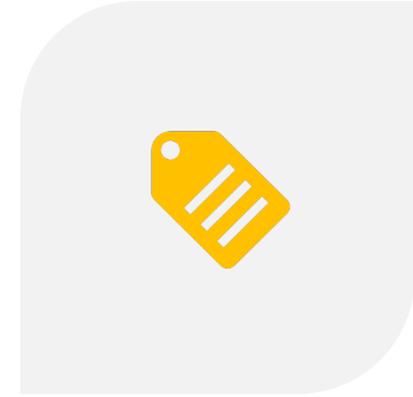
The term "specialty pet" means any domesticated animal pet normally maintained in a cage or tank, such as, but not limited to, gerbils, hamsters, canaries, psittacine birds, mynahs, finches, tropical fish, goldfish, snakes and turtles.



A COMMERCIAL FEED IS
NUTRITIONALLY SUITABLE FOR
ITS INTENDED USE AS
REPRESENTED BY ITS LABELING.



PROVIDES BASIC PRODUCT
INFORMATION THAT HELPS
INFORM THE CONSUMER HOW
TO SAFELY USE AND OBTAIN THE
BEST RESULTS AND BENEFITS.



UNIFORM LABELING ALLOWS
FOR A LEVEL PLAYING FIELD OF
COMMERCE

What is the purpose of a feed label?

Animal Feed Label

ALL ON THE
PRINCIPAL
DISPLAY PANEL

Product Name

IF drugs are used:

- The word “Medicated”
- The purpose of medication (claim statement)
- Required direction for use and caution statement
- An active drug ingredient

Guaranteed Analysis

- Crude Protein (min.)
- Maximum or minimum percentage of equivalent protein from non-protein nitrogen (NPN)
- Crude Fat (min.)
- Crude Fiber (max.)

Ingredient statement

Guarantor Name and Address

- At least City, State, and Zip if full address can be found in city directory or telephone directory

Net Weight Statement

- In both metric (grams, kilograms, milliliters, liters) and U.S. Customary System (ounces, pounds, fluid ounces)

Based on the NC Commercial Feed Law 31C

Animal Feed Label Example

Brand Name	YOUR NAME FEEDS
Product Name	Tennessee Jed's Horse Feed 
Purpose Statement (and medicated claim if required)	For maintenance of horses
Drug Guarantee (if applicable)	
Guaranteed Analysis	Guaranteed Analysis Crude Protein, minimum12.0% Crude Fat, minimum3.0% Crude Fiber, maximum12.0% Acid Detergent Fiber, maximum11.0% Neutral Detergent Fiber, maximum10.0% Calcium, minimum0.8% Calcium, maximum1.3% Phosphorus, minimum0.65% Copper, minimum20 ppm Selenium, minimum0.20 ppm Zinc, minimum40 ppm Vitamin A, minimum7000 IU/lb
Ingredient Statement	Ingredient Statement Grain Products, Plant Protein Products, Processed Grain By-Products, Molasses Products, Calcium Lignin Sulfonate, Vitamin A Supplement, D-Activated Animal Sterol (source of Vitamin D ₃), Riboflavin Supplement, Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Folic Acid, Ground Limestone, Dicalcium Phosphate, Copper Sulfate, Manganous Oxide, Magnesium Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Calcium Carbonate, Salt, Potassium Chloride.
Use Directions	FEEDING DIRECTIONS Feed 1/2 to 1 lb of feed per 100 lb of body weight per day for the maintenance of horses.
Precautionary Statement (if required)	
Responsible Party's Name & Address	YOUR NAME FEEDS City, State Zip
Quantity Statement	NET WT 50 lb (22.67 kg)

Pet Food / Treat Label

Product Name (PDP)

Net Weight Statement (PDP)

- In both metric (grams, kilograms, milliliters, liters) and U.S. Customary System (ounces, pounds, fluid ounces)

Species and Type (PDP)

- Dog Food, Cat Food, Dog Treat

Ingredient statement

Guaranteed Analysis

- Crude Protein (min.)
- Crude Fat (min.)
- Crude Fiber (max.)
- Moisture (max.)

Directions for Use

- If the product is suitable only for intermittent or supplements feeding it shall bear disclosure to that effect.
 - To be fed as a treat, not a meal replacement.
 - Intended for intermittent or supplemental feeding in addition to a balanced daily diet.

Guarantor Name and Address

- At least City, State, and Zip if full address can be found in city directory or telephone directory

Based on the NC Commercial Feed Law 31C

Pet Food / Treat Label Example

1) Product Name ————— **These Ole Bones**

3) Species and Type ————— Dog Treats

They'll make ya happy you still got yer teeth!

Romance Copy
See information at
bottom of page.



5) Guaranteed Analysis ————— **Guaranteed Analysis:**

Crude Protein minimum.....	12.3%
Crude Fat minimum.....	13%
Crude Fiber maximum.....	2.5%
Moisture maximum.....	20.5%

4) Ingredient Statement

Ingredients: Wheat Flour, Peanut Butter, Water, Oats, Canola oil, Eggs

7) Directions for Use — This product is intended to be fed as a treat, and not a meal replacement.

Marketing Claim ————— **Storage:**

Please keep treats stored in a closed air tight container. Store in your refrigerator up to 2 weeks or in the freezer for 2 months.

6) Guarantor Name and Address ————— **Manufactured By:**

3 Ole dawgs
Slickercity, NC 28786

2) Net weight Statement ————— Net wt. 5oz

Product Claims – Human Grade



AAFCO-defined feed term “human grade” is only acceptable in reference to the product as a whole



AAFCO definition: Every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for current good manufacturing practices (cGMPs) for human edible food as specified in 21 CFR 117.



The term “human grade” is false and misleading if the product as a whole is not considered ready-to-eat



Must be clearly labeled for its intended use as animal food. Ex: Human Grade Dog Food

What is required to substantiate a “human grade” claim?

- Documentation that each individual ingredient suppliers have verified that the individual ingredient supplied to the manufacturer is fit for human consumption.
- Documentation that every ingredient and the resulting product is stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for cGMPs for human edible foods as specified in 21 CFR part 117.
- Documentation that the manufacturing facility is licensed to produce human food by the appropriate authority and has been inspected and found compliant with 21 CFR Part 117 (110 if applicable).

Raw Milk as Animal Food

§ 106-266.35. Sale or dispensing of milk.

(a) Except as provided in subsection (d) of this section:

- (1) Only milk that is Grade "A" pasteurized milk may be sold or dispensed directly to consumers for human consumption.
- (2) Raw milk and raw milk products shall be sold or dispensed only to a permitted milk hauler or to a processing facility at which the processing of milk is permitted, graded, or regulated by a local, State, or federal agency.

(b) The Board of Agriculture may adopt rules to provide exceptions for dispensing raw milk and raw milk products for nonhuman consumption. Any raw milk or raw milk product dispensed as animal feed shall include on its label the statement "NOT FOR HUMAN CONSUMPTION" in letters at least one-half inch in height. Any raw milk or raw milk product dispensed as animal feed shall also include on its label the statement "IT IS NOT LEGAL TO SELL RAW MILK FOR HUMAN CONSUMPTION IN NORTH CAROLINA." This labeling requirement does not apply to raw milk or raw milk products dispensed for personal use or consumption to the independent or partial owner of a cow, goat, or other lactating animal.

(c) As used in this section, the term "sale" or "sold" means any transaction that involves the transfer or dispensing of milk and milk products or the right to acquire milk and milk products through barter or contractual arrangement or in exchange for any other form of compensation. The term "sale" or "sold" does not include the transfer or dispensing of raw milk or raw milk products to, or the right to acquire raw milk or raw milk products by, the independent or partial owner of a cow, goat, or other lactating animal.

Raw Milk as Animal Food



- Label format:
 - Product name
 - Intended species and use (Ex: Dog Treat, Cat Treat, Pet Treat)
 - “NOT FOR HUMAN CONSUMPTION” must be in all capital letters and at least ½ inch in height.
 - “IT IS NOT LEGAL TO SELL RAW MILK FOR HUMAN CONSUMPTION IN NORTH CAROLINA”: must be the same size as the next largest type after the “NOT FOR HUMAN CONSUMPTION” statement (i.e., product name type size)
 - Guaranteed Analysis: Must be listed in the following order and exact terms.
 - Crude Protein (minimum)
 - Crude Fat (minimum)
 - Crude Fiber (maximum) – if the product does not provide a significant source of crude fiber this nutrient is not required in the Guaranteed Analysis (i.e., values less than 1%)
 - Moisture (maximum)
 - Ingredient Statement: If milk is from any species other than cow, the species must be included in the Ingredient Statement (i.e., Raw Goat Milk)
 - Feeding Directions: If the product is suitable only for intermittent or supplemental feeding it shall bear disclosure to that effect.
 - Net Weight Statement
 - Guarantor Name and Address

Raw Milk as Animal Food

Single-sided labeling format example:

1) Product Name

Raleighwood Dairy

Raw Cow Milk Dog Treat

2) Intended Species
and Intended Use

**NOT FOR HUMAN
CONSUMPTION**

3) & 4) Required Caution Statements

**IT IS NOT LEGAL TO SELL RAW MILK FOR HUMAN
CONSUMPTION IN NORTH CAROLINA**

Romance Claims
and Graphics *



FROM FARM TO BOWL! Unpasteurized milk from local, pasture-raised Jersey cows.

Guaranteed Analysis:

Crude Protein (minimum).....	5%
Crude Fat (minimum).....	4%
Crude Fiber (maximum).....	1%
Moisture (maximum).....	88%

5) Guaranteed
Analysis

Ingredients: Raw Milk

6) Ingredient
Statement

Feeding Directions: This product is intended to be fed as a treat and not as a meal replacement.

7) Feeding Directions

Manufactured by:
Raleighwood Dairy
Raleigh, NC 27607

9) Guarantor Name and Address

Net Contents: 2 qt. (1.893 L)

8) Net Weight Statement

Raw Milk as Animal Food

Two-sided label format

Front facing label:

- Product name
- Intended species and type
- NOT FOR HUMAN CONSUMPTION
- IT IS ILLEGAL TO SELL RAW MILK FOR HUMAN CONSUMPTION IN NORTH CAROLINA
- Net weight statement

Rear facing label:

- Guaranteed Analysis
- Ingredient statement
- Feeding directions
- Guarantor name and address

Chews

- Referenced from the AAFCO Official Publication – Statements for Uniform Interpretation and Policy.
- Not adopted in NC Commercial Feed Law, but we offer some regulatory discretion.

7. **Chews, Bones, and Toys for Pets and Specialty Pets** - The following products, whether flavor-coated or unflavored, shall be exempt from registration and labeling, unless the manufacturer, in its product labeling or advertising, makes any claim that the product is intended for use as an animal food, or that the product provides anything of nutritional value to the animal (i.e., “digestible” or “high protein”). (Adopted 1989, Amended 1996, 2001, 2004, 2007, 2008)

NOTE: Labeling information required by the Code of Federal Regulations are applicable to the labeling of all these products:

- All chews, bones, toys and exercisers made of animal skin, hide, wood, or man-made material
- Hooves
- Ears
- Animal Bones
- Ligaments
- Snouts
- Pizzles

Rawhide generally refers only to beef, and many of these chews use other types of animal skins or hides.



THANK YOU!

Justin Hill | justin.hill@ncagr.gov | <https://www.ncagr.gov/fooddrug/feed/index.htm>