# PET FOOD/TREAT WEBINAR | PART 2

Marissa Cohen, Area Specialized Agent – Animal Food Safety Dr. Michael Joseph, Value-Added Processing Assistant Professor Justin Hill, NCDA&CS Feed Compliance Officer Jessica Gore, NCDA&CS FSMA Trainer



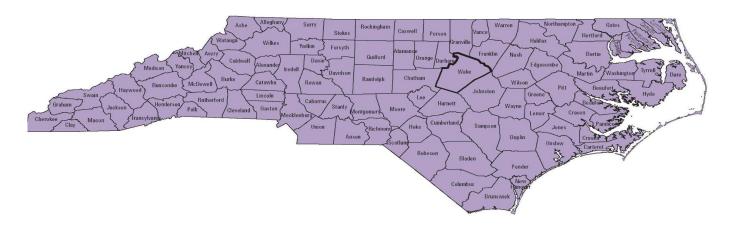
### Introductions

Marissa Cohen, NC State Dr. Michael Joseph, NC State Jessica Gore, NCDA&CS Justin Hill, NCDA&CS Sara Drake, NC State



### Marissa Cohen

### Area Specialized Agents FOOD SAFETY-ANIMAL FOOD & FEED RULE



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### Introductions

Marissa Cohen, NC State Dr. Michael Joseph, NC State Jessica Gore, NCDA&CS Justin Hill, NCDA&CS Sara Drake, NC State



### 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



### NC STATE UNIVERSITY

# Agenda

- Brief summary of webinar 1
- Product registration
- Animal food safety
- Use of approved ingredients
- Resources



# Summary of Part 1

- Pet food and treats are regulated by NCDA&CS Food and Drug Division.
  - The FDA is the regulatory party responsible for ensuring safe food for animals
- Facility registration is required for anyone producing commercial feed (including pet food) in North Carolina.
- Facilities will be inspected at least once
  - This does not have to happen before you begin to sell your products. Only registration needs to be completed first.



# Summary of Part 1

- There are a number of required components for a pet food label:
  - Product name, net weight statement, species and type, ingredient statement, guaranteed analysis, guarantor name and address, directions for use.
- There are limitations for how products can be named or described.
- Labeling requirements are different for chews and raw milk
- Human grade products must be prepared in a way that they are fit for human consumption (not raw)



# Summary of Part 1

- Be aware of any "drug" claims
  - CBD is not a legal feed ingredient for livestock feeds, pet food or pet treats
  - Social media and website are auditable
- Packaging claims for raw pet food
  - If there are cooking directions on the packaging, but the food is meant to be fed raw



# **Product Registration**





# Animal Food Safety & Use of Approved Ingredients



**Feed Milling** 

### Animal food safety

- FDA has a zero tolerance policy for *Salmonella* in pet food.
- What can be done to minimize contamination?
  - □ Cooking for the appropriate amount of time at a high enough temperature
  - □ Irradiation is an option for raw pet food, but it is prohibitively expensive
  - □ High pressure processing (HPP)
  - Minimize recontamination with raw ingredients or products
  - Use effective sanitizers and thoroughly clean equipment and surfaces



### Raw diets

- Increasingly popular niche market for pet food
- Raw diets are allowable, but the FDA's zero-tolerance policy for Salmonella still applies
  - □ Have a good recall plan in place, whether it is required or not
  - □ Keep good ingredient and processing documentation
    - Be able to trace ingredients one step back and food one step forward
  - □ Customer education on best handling practices
    - Many of these resources are available on the FDA website



### Ingredients

- All ingredients must have either Generally Recognized as Safe (GRAS) status, FDA approval, or an AAFCO definition.
  - CBD is not a legalized ingredient for pet food or livestock feed at this time. Further review is required to determine the effects of these products on animals and their products.
  - □ We're seeing an increase in specialty products from smaller facilities using novel by-product ingredients.



### Association of American Feed Control Officials

Though AAFCO does not regulate pet food, their website is a great resource for anyone who wants to get started in the pet food business

State-by-state regulatory guidance and contact information



# **Government agencies**

- The FDA has educational materials available specific to pet food
  - Guidance documents
  - □ Compliance policy guides
  - Recall and warning letters
    - Good references for building a food safety program
  - Consumer and producer educational materials
  - Reportable Food Registry



### **NC State Resources**

- Feed Milling (Animal Food) website
  - □ feedmilling.ces.ncsu.edu
  - Starting a Pet Food Business page
- County Ag Agents
  - □ ces.ncsu.edu
- Area Specialized Agent Animal Food Safety
  - Marissa Cohen (marissa\_cohen@ncsu.edu)
- Value-Added Processing Specialist
  - Dr. Michael Joseph (mvjoseph@ncsu.edu)
- Feed Manufacturing Specialist
  - Dr. Adam Fahrenholz (adam\_fahrenholz@ncsu.edu)



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**Feed Milling** 



# Please add your questions to the Q&A box.

### We will answer questions until we run out of time!

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### **Feed Milling**

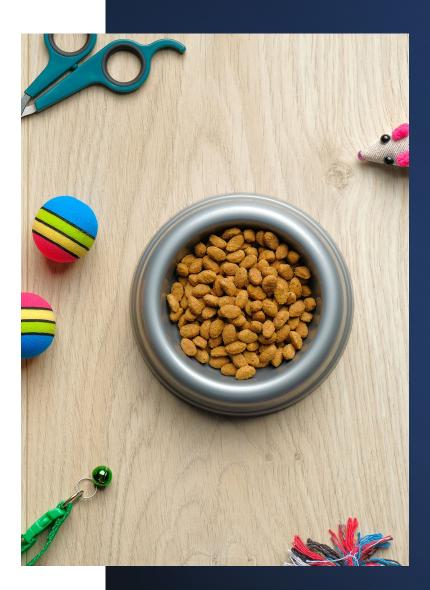
# ANIMAL FOOD PRODUCT REGISTRATION

Justin Hill

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

# Registration

• To be distributed in the State of North Carolina, all commercial feeds, except a customerformula feed, must be registered.



# What is the cost to register?

All registration fees are <u>annual fees</u>



\$5 per brand sold in packages over 5 lbs.



\$40 per brand sold in packages of 5 lbs. or less

\$

\$45 per brand sold in packages of 5 lbs. or less & over 5 lbs.



\$12 per brand sold in canned or hermetically sealed containers



\$30 delinquency fee is added per brand if registration is late, or product is found being distributed without registration.

# Definitions

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.

# One Vs. Two

- These Ole Bones Small Dog Treats
- These Ole Bones Large Dog Treats
- These Ole Bones Dog Treats
  1lb or 5 lbs. options
- You may offer different sizes and shapes under <u>a single product</u> <u>name.</u>

AII Separate Products

- These Ole Bones Dog Treat
- These Ole Bones with Apple Dog Treat
- These Ole Bones with Peanut Butter Dog Treat
- These Ole Beef Bones Dog Treat
- These Ole Beef Bones with Peanut Butter Dog Treat
- Different shapes and sizes of the same formula are okay. Adding ingredients is not the same!

# What's needed?



# New Firm Form

#### North Carolina Food & Drug Protection Division Animal Feed Program

#### NEW MANUFACTURER/FIRM ACCOUNT INFORMATION FORM

Please provide contact information in order to keep our records current. This form is for **FIRM** information only, meaning the Manufacturer and/or Guarantor legally responsible for the products. The information on this form should **NOT** include any contact information for 3rd party agents, registrants, etc. If product registration is managed by an agent other than the **FIRM**, please complete "New Agent Relationship Information Form" to submit contact information for 3rd party agents, registrants, etc. <u>in addition to this form</u> in order to complete the registration process.

| Please provide FIRM information only.                                     |                     |                   | CLEAR DATA |         |
|---|---------------------|-------------------|------------|---------|
| Firm Name*  |                     |                   |            |         |
|   |                     |                   |            |         |
| Dhusiaal Addaese*   |                     |                   |            |         |
| Physical Address*   |                     |                   |            |         |
|   |                     |                   |            |         |
|   |                     |                   |            |         |
| City  | State               | Postal Code       | County     | Country |
|   |                     |                   |            |         |
| Main Phone Number* Website  |                     |                   |            |         |
|   |                     |                   |            |         |
| Firm Mailing Adds   | ace - Check if info |                   | ahawa      |         |
| Firm Mailing Addr   |                     | mation is same as | above      |         |
|   |                     | 1                 |            |         |
| City  | State               | Postal Code       | County     | Country |
|   |                     |                   |            |         |
| Firm Primary Contact Name* Firm Primary Contact Phone Number & Extension* |                     |                   |            |         |
|   |                     |                   |            |         |
|   |                     |                   |            |         |
| Firm Primary Cont   | act Email Address'  | •                 |            |         |
|   |                     |                   |            |         |
| *required field   |                     |                   |            |         |

1070 Mail Service Center, Raleigh, North Carolina 27699-1070 • (919) 733-7366 • Fax (919) 733-6801 Form F\_3005 (10/20) 1 New Firm Info

# New Brand Template

|    | A   | В   | С             | D                | E                            | F           | G            |
|----|---|-----|---------------|------------------|------------------------------|-------------|--------------|
| 1  | Brand Name                                | Fee | Class         | Composition Type | Manufacturer's<br>Product ID | NADA Number | UPC Codes    |
| 2  | Big Al's Cattle Feed                      | 5   | Ruminant      | Textured         | AA5987-14                    | 123-456     | 123456789123 |
| 3  | Big Al's Kitten Food                      | 40  | Pet Food      | Kibble           | bb.12355as                   |             |              |
| 4  | Big Al's Adult Lamb & Brown Rice Dog Food | 45  | Pet Food      | Kibble           | 123.asd                      |             |              |
| 5  | Big Al's Canned Tuna & Salmon Cat Food    | 12  | Pet Food      | Moist            | 59887330122                  |             |              |
| 6  | Big Al's Chicken Scratch Feed             | 5   | Poultry/Swine | Mix              |                              |             |              |
| 7  | Big Al's Pumpkin & Blueberry Dog Treats   | 40  | Pet Treat     | Nugget           |                              |             |              |
| 8  | Big Al's Apple Dog Treats                 | 40  | Pet Treat     | Semi-Moist       |                              |             |              |
| 9  |   |     |               |                  |                              |             |              |
| 10 |   |     |               |                  |                              |             |              |

# Feed Class & Composition Types

### Feed Class & Composition Types for feed brands

Please note that older instructions and forms may have composition and/or Feed Class types not on this revised list.

If you believe your **Composition Type** is not on the list, please identify the product as "Other" or call our office and ask a compliance officer to help you. <u>Please list "Freeze Dried" products as "Other" composition type.</u>

If you are unsure of the **Feed Class**, please identify the product as Miscellaneous or call our office and ask a compliance officer to help you.

| Composition Type  | Feed Class                        |
|-------------------|-----------------------------------|
| Coarse grain      | Animal By-Product                 |
| Crumble           | Commodities                       |
| Cube              | Drug Article/Premix (A/B)         |
| Fat               | Feed Additive                     |
| Flake/Shred       | Fish Food (Non-Specialty)         |
| Forage            | Forage                            |
| Granule           | Horse                             |
| Kibble            | Miscellaneous                     |
| Liquid            | Nutritional Supplement (Non-pet)  |
| Meal              | Pet Food                          |
| Mix               | Pet Treat                         |
| Moist             | Pet Supplement                    |
| Nugget            | Plant By-Product                  |
| Oil               | Poultry/Swine                     |
| Other             | Ruminant                          |
| Pellet            | Specialty Pet                     |
| Powder            | Vitamin/Mineral (Non-pet)         |
| Prill             | Wild Bird/ Wildlife               |
| Semi-Moist        | Attractant (Flavor/Aroma) Hunting |
| Single Ingredient | Camelid                           |
| Sweet             | Cervid (Non-single ingredient)    |
| Textured          | Multi-Stock                       |
| Whole Grain       | Zoo/Exotic                        |

# **Compliant Labels**

-These Ole Bones 1) Product Name -

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 -----— <u>Storage:</u>

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 Bv:

> 3 Ole dawgs Slickercity, NC 28786

2) Net weight Statement -

- Net wt. 5oz

# New Facility Registration Form

#### North Carolina Food & Drug Protection Division Animal Feed Program

#### New Manufacturing/Distribution Facility Registration Form

Please complete and submit this form to <u>ncfeed\_registration@ncagr.gov</u> if manufacturing, distributing, processing, packing, and/or holding commercial animal feed products in a facility located in the state of North Carolina.

#### Firm Details:

Please fill out the following information, as applicable.

| Legal Company Name:             |  |
|---------------------------------|--|
| Email Address:                  |  |
| Website:                        |  |
| Phone #:                        |  |
| Fax #:                          |  |
| Address:                        |  |
| City, State, Zip Code:          |  |
| Mailing Address (if different): |  |
| City, State, Zip Code:          |  |

The address listed above is a personal residence.

#### **Contact Information:**

| Primary Contact        |  |
|------------------------|--|
| Company Name:          |  |
| First & Last Name:     |  |
| Title:                 |  |
| Address:               |  |
| City, State, Zip Code: |  |
| Phone #:               |  |
| Fax #:                 |  |
| Email:                 |  |
| Website:               |  |

#### Secondary / Corporate Contact

| Company Name:          |  |
|------------------------|--|
| First & Last Name:     |  |
| Title:                 |  |
| Address:               |  |
| City, State, Zip Code: |  |
| Phone #:               |  |
| Fax #:                 |  |
| Email:                 |  |
| Website:               |  |

#### Product Details:

Please provide a brief description of product types.

#### Manufacturing/Processing Details:

Please provide a brief description of manufacturing & processing details (e.g., mixing, baking, freezing, etc.).

# Agent Registration

# Not required, just an option

### North Carolina Food & Drug Protection Division Animal Feed Program

#### NEW AGENT RELATIONSHIP ACCOUNT INFORMATION FORM

Please provide contact information in order to keep our records current. This form is for **AGENT** information <u>only</u>, meaning if product registration is managed or submitted by a 3rd party agent, registrant, etc. Contact information for the **AGENT** must be provided to include Primary Contact name, phone number, and email address in order to complete the registration process.

| Please provide               | AGENT information. |   | CLEAR DATA |  |
|------------------------------|--------------------|---|------------|--|
| Agent Firm Na                | me*                |   |            |  |
| Agent Mailing                | Address*           |   |            |  |
| City                         | State              | Postal Code                             | Country    |  |
| Agent Primary Contact Name*  |                    | Agent Primary Phone Number & Extension* |            |  |
| Agent Primary Email Address* |                    |   |            |  |

\*required field

# Things to Note

- All registration fees are annual fees.
- The registration fees are inclusive to all package sizes.
- Registration runs from January 1<sup>st</sup> December 31<sup>st</sup> of each year.
- You may register product at any time during the year.
- Send everything at one time!
- Renewal notices are generally sent out in October and fees for the next year must be paid by December 31<sup>st</sup> to avoid late fees.
- <u>NCFEED.Registration@ncagr.gov</u>

# **THANK YOU!**

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