

December 31, 2018

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Initiated by your official pet food complaint filed in August 2018, The Pennsylvania Department of Agriculture (hereinafter PDA) conducted an investigation to determine if No-Hide chews were misbranded and/or adulterated under the provisions in the Pennsylvania Commercial Feed Act (act of December 12, 1994, P.L. 903, No. 131. 3 Pa.C.S.A §§ 5101-5115 and 7 Pa Code Chapters 71 and 72).

"No-Hide" brand products guaranteed by Earth Animal Ventures of Southport, CT and manufactured by Pony Express Foods, LLC of New Holland, PA (hereinafter "Pony Express") were inspected and sampled over the course of multiple site inspections, retail store and mail-order purchases.

Our investigation has provided no evidence that Pony Express Foods is misbranding the Earth Animal Venture's No-Hide brand chews.

The following are findings of fact:

1. During two onsite inspections at Pony Express, our inspection team observed the production of No-Hide chews. Ingredients were blended together, dough was hand-rolled and baked onsite in clear view of the inspection team. No rawhide products were observed in the production area or packaging area at Pony Express.
2. Records collected of the formulas indicate that animal products (meat, poultry and fish) are used in the batters that are hand applied to the No-Hide chews. The production process at Pony Express allows for unintentional DNA transfer from one batter recipe to the next and will transfer to the No-Hide chews as well.
3. Documentation was obtained of incoming ingredients for the No-Hide chews. Ingredients appeared to match the formulas of the chew and the batter.
4. During production of the No-Hide chews, it was observed that the dough is processed and hand rolled into a shape that appears identical to that of rawhide chews. The hand rolled dough is sometimes filled with smaller pieces of the dough that fall off the conveyor. This will also close the ends on some of the No-Hide chews. This characteristic is not found on all No-Hide chews due to the nature of being hand rolled by individual persons.
5. Pony Express used several types of metal baking racks to manufacture the No-Hide chews. Some baking racks have a square pattern and some baking racks have a diamond pattern. These patterns may or may not appear on the finished product, as observed by the inspection teams.
6. Samples of No-Hide chews and raw dough were collected at Pony Express as well as purchased from Amazon.com and retail stores. For comparison, rawhide chews were also obtained at Pony Express and

purchased from Amazon.com and retail stores. The samples were analyzed for starch and crude protein. Final analysis indicated that No-Hide raw dough has a higher starch percentage and a lower crude protein percentage than the baked No-Hide products. Baked No-Hide chews and rawhides had similar starch and crude protein results.

7. A histological examination was conducted on rawhide and No-Hide products to determine if animal hide was present in the No-Hide chews. The examiner was not able to identify specific cellular detail in either of the samples presumably due to the commercial processing of both products that damaged the integrity of the original tissue. This test was inconclusive since it was unable to determine any significant identifying characteristics of the samples.

8. Rawhide products purchased and received by Pony Express are stored in trailers outside of the production facility. The rawhides are distributed retail to consumers at a farmer's market but records showed they are also sold wholesale to other retailers. This appears to account for the large amount of rawhide imported and received by Pony Express.

In conclusion, PDA has no evidence that suggests Pony Express is misleading consumers by misbranding or adulterating No-Hide products with rawhide.

During the production and processing of the No-Hides at Pony Express it appears the final product takes on characteristics of rawhide products such as, low to no measurable starch, a high crude protein percentage, multiple animal species DNA and in appearance due to the proprietary machine process and hand-rolling.

If you have any questions regarding our investigation, the sample results or the information contained in the letter, feel free to contact me at (717)772-5216 or at [davdressle@pa.gov](mailto:davdressle@pa.gov).

Sincerely,



David Dressler  
Agronomic Program Specialist

cc: Travis Cundiff, Pony Express Foods, 1016 E Main Street, New Holland, PA 17557  
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Enclosures