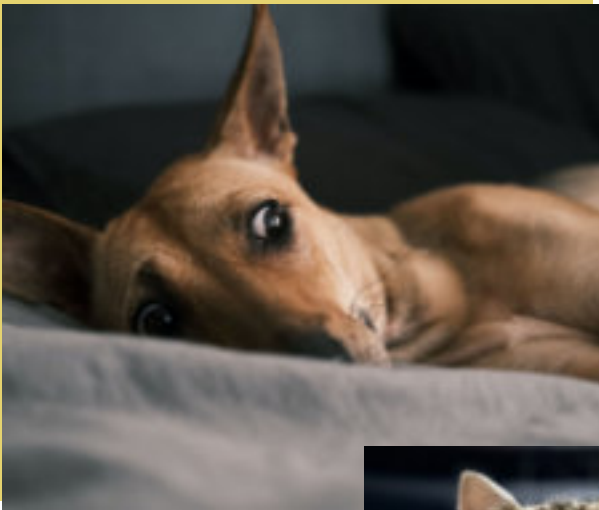


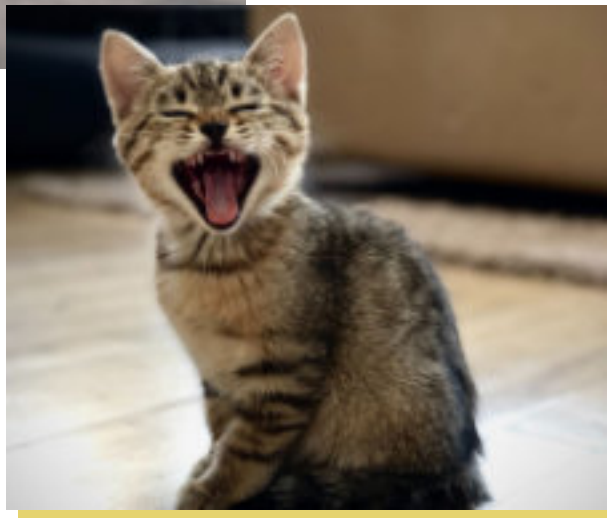


Association for Truth in Pet Food
A pet food consumer stakeholder organization

The categories, styles, legal requirements and recall data of commercial pet food in the United States.



There are thousands of different pet food options for pet owners to choose from. Pet owners and veterinarians are often forced to make purchasing or recommendation decisions based on pet food marketing, which is poorly regulated in the US and often extremely misleading. This document provides guidance for pet food consumers on the legal requirements, the legal loopholes, and recall history to better understand each category and style of pet food.



Who Regulates Pet Food in the US?

Pet food in the U.S. is regulated by federal laws and state laws. Federal laws are enforced by the Food and Drug Administration (FDA). State laws are most often enforced by the state's Department of Agriculture, however in some states other government agencies are tasked with enforcement of pet food regulations and some states do not regulate pet food at all.

Pet food nutritional requirements, label requirements, and ingredient definitions are established by/written by the Association of American Feed Control Officials (AAFCO), a private organization of state and federal feed/pet food authorities. AAFCO publishes these requirements as Model Bills which are adopted into state law in some states. While most of the work AAFCO publishes is copyright protected, the organization released ingredient definitions for public view in 2021. Those can be accessed here: <https://www.aafco.org/Publications/OP-Chapter-6-Public-Access>. AAFCO does not regulate pet food.

Categories of Pet Food

All styles of pet food fall into one of two different categories, **Human Grade** (food) or **Feed Grade** (feed). Most pet foods that meet the legal requirements of Human Grade are labeled as such, however current pet food regulations do not require label disclosure of Feed Grade pet foods.



What is Human Grade?

The legal definition of Human Grade pet food is: *“Human Grade: Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for current good manufacturing practices (cGMPs) for human edible foods as specified in 21 CFR (Code of Federal Regulations) Part 117.”* [1]

Ingredient Quality of Human Grade Pet Foods

Human Grade pet food ingredients are of the same exact quality as human food, required to meet all safety and quality standards of human food.

As example: the ingredient ‘chicken’ listed on a Human Grade pet food label would mean only USDA inspected and passed chicken is included in the pet food.

Supplement Quality of Human Grade Pet Foods

Human Grade pet food supplements are of the same exact quality as human supplements, required to meet all safety and quality standards of human supplements.

Manufacturing Standards of Human Grade Pet Foods

Human Grade pet food manufacturing standards are the same as for human food manufacturing, required to meet all safety and quality standards of human food manufacturing.

What is Feed Grade?

The legal definition of Feed Grade pet food is: *“Feed Grade: Material that has been determined to be safe, functional and suitable for its intended use in animal food, is handled and labeled appropriately, and conforms to the Federal Food, Drug and Cosmetic Act unless otherwise expressly permitted by the appropriate state or federal agency (Suitable for use in animal feed).”* [2]

Ingredient Quality of Feed Grade Pet Foods

Feed Grade pet food ingredients could be the same quality as human food, or they could be condemned/inedible quality allowed to be processed into pet food by regulatory authorities.

As example: the ingredient ‘chicken’ listed on a Feed Grade pet food label is not required to be sourced from USDA inspected and passed poultry, and is allowed to be sourced from condemned poultry with no disclosure to the consumer.

The FDA has directly given its permission to Feed Grade manufacturers to source highly inferior animal origin ingredients. The director of the FDA’s Center for Veterinary Medicine, Dr. Steven Solomon stated (April 2019): *“we do not believe that the use of diseased animals or animals that died otherwise than by slaughter to make animal food poses a safety concern and we intend to continue to exercise enforcement discretion.”* [3]

Supplement Quality of Feed Grade Pet Foods

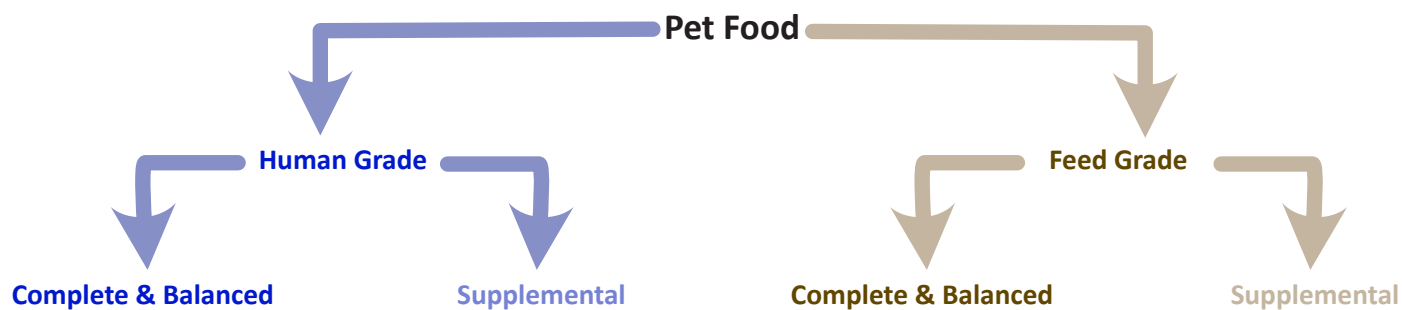
Feed Grade pet food supplements are held to commercial feed law specifications and are legally defined by AAFCO. Some AAFCO defined Feed Grade supplements are allowed by definition to include higher levels of impurities (including heavy metals) not allowed in human supplements. As example: one legally defined zinc supplement used in animal feed is allowed to contain up to 90 parts per billion lead.

Manufacturing Standards of Feed Grade Pet Foods

Feed Grade pet food manufacturing standards are held to commercial feed law specifications. Manufacturing safety and quality standards can be significantly lower than that of human food manufacturing.

As example: through Freedom of Information Act (FOIA) request we learned of an FDA inspection of a Mars Petcare manufacturing facility. The FDA inspection report found the pet food (feed) plant to be contaminated with pests (roaches), significantly in the food production area. The FDA also noted the manufacturer failed to minimize deterioration of raw ingredients. Despite finding serious manufacturing concerns, no recall was required. [4]

The next breakdown of categories of pet foods is whether the products are **Complete & Balanced** or **Supplemental** diets.



Pet foods labeled as Complete and Balanced are legally required to meet minimum (and in some cases maximum) levels of required nutrients necessary for cats and dogs. ‘Complete’ indicates all required nutrients are provided in the pet food, ‘Balanced’ indicates required nutrients meet the legally established minimum levels and do not exceed any maximum levels.

The FDA states: “To have ‘complete and balanced’ in the nutritional adequacy statement, a dog or cat food must either:

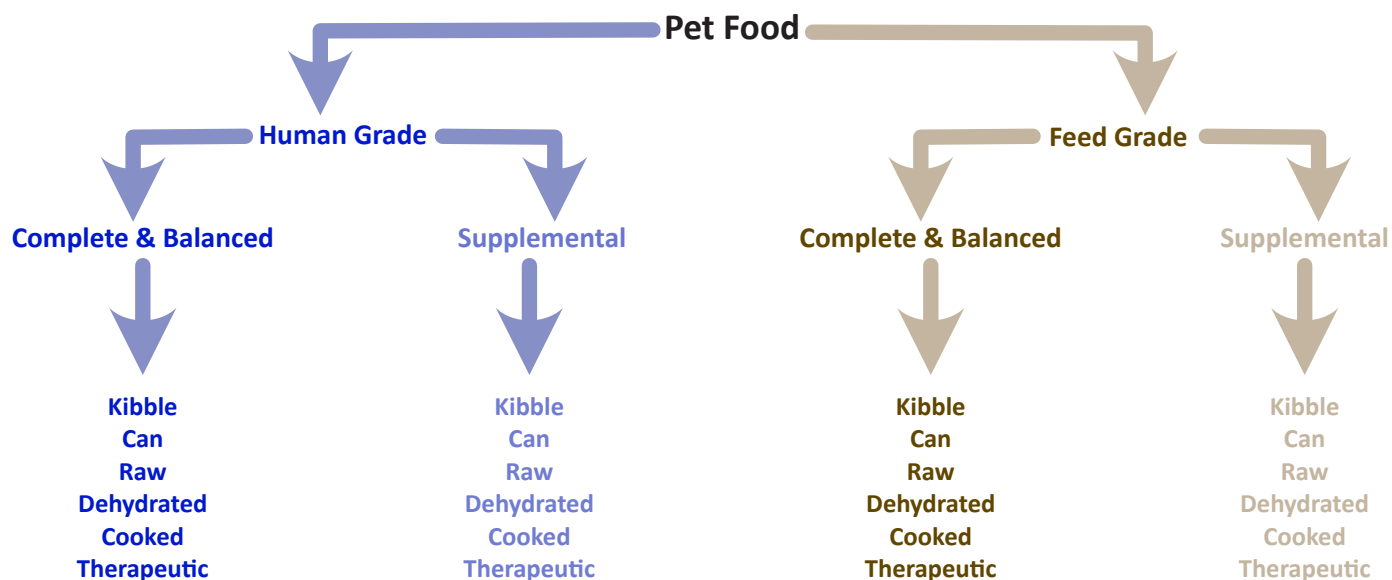
- Meet one of the Dog or Cat Food Nutrient Profiles established by the Association of American Feed Control Officials (AAFCO); or
- Pass a feeding trial using AAFCO procedures.” [11]

The Association of American Feed Control Officials own the nutritional profiles and copyright protects the information, however a 2014 version of the nutrient profiles (believed to be the most current) can be read here: http://www.aafco.org/Portals/0/SiteContent/Regulatory/Committees/Pet-Food/Reports/Pet_Food_Report_2013_Midyear-Proposed_Revisions_to_AAFCO_Nutrient_Profiles.pdf

Pet foods labeled as Supplemental are diets that do not meet the AAFCO nutritional requirements. Some supplemental pet foods are intended as toppers to a complete diet or intended to be fed short term (such as some therapeutic diets), other supplemental pet foods are formulated to a different nutritional standard than AAFCO’s nutritional requirements.

Styles of Pet Food

All styles of pet foods - kibble, can, raw, cooked, dehydrated and theraputic - are futher categorized under the Complete and Balanced or Supplemental sections of either Human Grade or Feed Grade options.



Each style of pet food is detailed on the following pages.

Kibble Pet Food

What is the legal definition of Kibble Pet Food?

Kibble is legally defined by AAFCO as a process, *“Cracked or crushed baked dough, or extruded feed that has been cooked prior to or during the extrusion process.”* The most common manufacturing method for kibble pet foods is extrusion. Extrusion is legally defined by feed control officials as a process, *“A process by which feed has been pressed, pushed, or protruded through orifices under pressure.”* According to the Global Alliance for Pet Food Associations *“In the extrusion process, the dough is heated under pressure, then pushed through a die machine that cuts the kibbles. Kibble size and shape varies according to the product specification. The kibbles are dried, cooled and spray coated.”* [6]

Kibble pet foods can also be baked or air dried (instead of extruded). While extruded kibble is a legally defined process, air dried or baked kibble has no legal definition for the processes used.

Human Grade or Feed Grade Kibble Options

Many kibble pet foods are Feed Grade, due to commonly used Feed Grade ingredients and manufacturing standards. Currently there are very limited options for Human Grade kibble, these are baked options.

Kibble Potential Concerns

One of the most commonly used dry ingredients in kibble pet foods are rendered ingredients known as meat meals such as ‘chicken meal’. Meat meal ingredients are rendered (cooked) prior to the cooking of the pet food, and are allowed by their legal definition to be sourced from meat or bones or a combination of meat and bones.

Up until April 2019, the FDA Compliance Policy Guides included the agency’s permission to allow rendered pet food ingredients to violate federal law. Compliance Policy Guide Sec. 675.400 Rendered Animal Feed Ingredients [7] stated: *“No regulatory action will be considered for animal feed ingredients resulting from the ordinary rendering process of industry, including those using animals which have died otherwise than by slaughter...”*

The FDA removed this policy from the agency’s website in April 2019, however the agency continues to allow these illegal rendered ingredients in a not-so-public manner. The director of the FDA’s Center for Veterinary Medicine, Dr. Steven Solomon stated at the time the public policy was removed from the agency’s website, (April 2019) the FDA’s opinion on the allowance of these illegal ingredients had not changed: *“we do not believe that the use of diseased animals or animals that died otherwise than by slaughter to make animal food poses a safety concern and we intend to continue to exercise enforcement discretion.”* [3]

The pet food label is not required to disclose the percentage of meat included in any meat meal ingredient or if the ingredient was sourced from USDA inspected and passed livestock or condemned or non-slaughtered livestock.

Kibble Pet Food Recall History

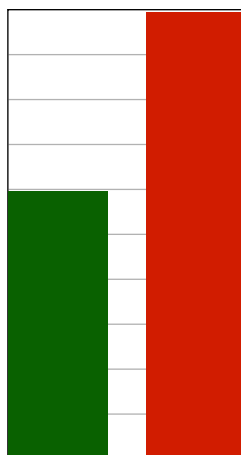
Last ten years (2012 through 2021):

- According to FDA Enforcement Report records [13], based on pounds recalled, 66% of all recalled pet food in the past ten years was kibble.
- The most common cause of kibble recalls (over the past ten years) was pathogenic bacteria contamination (such as Salmonella, Listeria, or E.coli), 98% of all pathogenic bacteria recalls over the past ten years was for kibble pet foods.

Kibble Pet Food Percentage of Sales compared to Percentage of Recalls in 2021

According to industry statistics [5], kibble/dry style pet foods sales in the US were:

59%
of all pet food sales in 2021.



According to FDA Enforcement Report records [13], more than 66 million pounds of kibble pet foods were recalled in 2021. The leading cause was aflatoxin contamination. And in 2021, kibble pet foods were 98% of all pet foods recalled for pathogenic bacteria. Kibble pet foods recalled were:

99%
of all recalls (pounds) in 2021.

Considerations for feeding kibble pet foods

Could be highly processed

In some kibble foods, ingredients are cooked four times—in the rendering process, during the mixing, during extrusion, and final drying—before your pet consumes the food. However, some kibble pet foods are carefully processed using many whole food ingredients, and cooked to minimal temperatures. Look for products that contain whole food ingredients—such as chicken, beef, corn, peas—instead of processed meal ingredients such as chicken meal, beef meal, corn meal, and pea protein.

Question quality of ingredients

Many kibble pet foods utilize feed grade ingredients and supplements, however some manufacturers produce foods that include all or most ingredients from human edible (human grade) sources. Ask your manufacturer for a guarantee: 1) Do you guarantee all food ingredients are human edible quality?, 2) Do you guarantee all supplements are human edible quality? The manufacturer might use some human edible quality ingredients and some feed grade quality, if so, ask them to clarify which ingredients are human grade and which are feed grade. With this information, pet owners can make informed purchasing decisions.

Risk of dyes

Many kibble pet foods include dyes to make the product more appealing to the consumer. However, many dyes come with risks [15]. To minimize risk to your pet from dyes, avoid pet foods that include dyes such as Red 40, Yellow 5 and Yellow 6.

Safe Handling

As recall statistics show, kibble pet foods are the most commonly recalled style of pet food for pathogenic bacteria. Because of this risk, pet owners should follow safe handling procedures with kibble pet foods. The FDA provides this advice for all styles of pet food [14]:

Tips for Buying Pet Food

Buy pet food products (cans, pouches, or bags) that are in good condition. Check the packaging for visible signs of damage, such as dents, tears, and discolorations.

Tips for Preparing Pet Food

Begin and end with clean hands. Both before and after handling pet food and treats, wash your hands for at least 20 seconds with soap and hot water.

Wash pet food bowls and scooping utensils with soap and hot water after each use.

Do not use your pet's food bowl as a scooping utensil. Use a clean scoop, spoon, or cup instead. Use the scooping utensil only for scooping pet food.

Testing

The safety of any pet food depends on diligent testing of ingredients and the finished pet food. Some manufacturers require certificates of analysis when receiving every ingredient, others do not. Ask your manufacturer what consistent testing is performed on ingredients and what consistent testing is performed on finished pet foods; ask what tests are performed, and how often.

For pet foods that contain grains, ask the manufacturer if all grain ingredients and each batch of finished pet food is tested for mycotoxins. Mycotoxins at high levels can cause death, at low levels over time can cause numerous serious health concerns in your pet. Risk can be avoided with proper testing.

Can Pet Food

What is the legal definition of Can Pet Food?

Canned is legally defined by AAFCO as a process, “a term applied to a feed which has been processed, packaged, sealed, and sterilized for preservation in cans or similar containers.” Similar containers to cans would be Tetra Pak pet foods.

Human Grade or Feed Grade Can Options

As of the publication of this document, there are no canned pet foods available as Human Grade. There are however several Tetra Pak contained pet food brands that meet all requirements of Human Grade.

Can Potential Concerns

Up until April 2019, the FDA Compliance Policy Guides included the agency’s permission to allow canned pet food to contain (federal law) illegal ingredients. Compliance Policy Guide Sec. 690.300 Canned Pet Food stated: “Pet food consisting of material from diseased animals or animals which have died otherwise than by slaughter, which is in violation of 402(a)(5) will not ordinarily be actionable, if it is not otherwise in violation of the law. It will be considered fit for animal consumption.” [8]

The FDA removed this policy from the agency’s website in April 2019, however the agency continues to allow these illegal ingredients in a not-so-public manner. Per the director of the FDA’s Center for Veterinary Medicine, Dr. Steven Solomon stated at the same time the public policy was removed (April 2019) the agency’s opinion on the allowance of these illegal ingredients in canned pet food had not changed: “we do not believe that the use of diseased animals or animals that died otherwise than by slaughter to make animal food poses a safety concern and we intend to continue to exercise enforcement discretion.” [3]

Can Pet Food Recall History

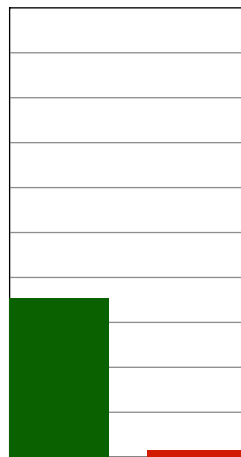
Last ten years (2012 through 2021):

- According to FDA Enforcement Report records [13], based on pounds recalled, 32% of all recalled pet food in the past ten years was canned.
- The most common cause of canned pet food recalls (over the past ten years) was pentobarbital contamination. Pentobarbital is the drug used to euthanize animals. 86% of all canned pet food recalls over the past ten years was for pentobarbital contamination.
- 11% of canned pet food recalls over the past ten years was for excess or insufficient vitamins or minerals.

Can Pet Food Percentage of Sales compared to Percentage of Recalls in 2021

According to industry statistics [5], canned/wet style pet foods sales in the US were:

36%
of all pet food sales in 2021.



According to FDA Enforcement Report records [13], 190,865 pounds of canned pet foods were recalled in 2021, all recalled products contained excess vitamin D. Can pet foods recalled were:

0.08%
of all recalls (pounds) in 2021.

Considerations for feeding canned pet foods

Question quality of ingredients

Many canned pet foods utilize feed grade ingredients and supplements, however some manufacturers produce foods that include all or most ingredients from human edible (human grade) sources. Ask your manufacturer for a guarantee: 1) Do you guarantee all food ingredients are human edible quality?, 2) Do you guarantee all supplements are human edible quality? The manufacturer might use some human edible quality ingredients and some feed grade quality, if so, ask them to clarify which ingredients are human grade and which are feed grade. With this information, pet owners can make informed purchasing decisions.

Safe Handling

Canned pet foods are least likely to be contaminated with a pathogenic bacteria, however safe handling practices should be implemented for all styles of pet food. The FDA provides this advice for all styles of pet food [14]:

Tips for Buying Pet Food

Buy pet food products (cans, pouches, or bags) that are in good condition. Check the packaging for visible signs of damage, such as dents, tears, and discolorations.

Tips for Preparing Pet Food

Begin and end with clean hands. Both before and after handling pet food and treats, wash your hands for at least 20 seconds with soap and hot water.

Wash pet food bowls and scooping utensils with soap and hot water after each use.

Do not use your pet's food bowl as a scooping utensil. Use a clean scoop, spoon, or cup instead. Use the scooping utensil only for scooping pet food.

Testing

The safety of any pet food depends on diligent testing of ingredients and the finished pet food. Some manufacturers require certificates of analysis when receiving every ingredient, others do not. Ask your manufacturer what consistent testing is performed on ingredients and what consistent testing is performed on finished pet foods; ask what tests are performed, and how often.

Raw Pet Food

What is legal definition of Raw Pet Food?

Raw is legally defined as *“Food in its natural or crude state not having been subjected to heat in the course of preparation as food.”*

Human Grade or Feed Grade Raw Pet Food Options

As of the publication of this document, pet food regulations do not allow raw pet foods to make a Human Grade label claim even if the product meets all legal requirements of the term.

Raw Pet Food Potential Concerns

Unlike any other style of pet food, the FDA has issued a Guidance Document to the raw pet food industry requesting that all meat and poultry derived ingredients be Human Grade, *“passed for human consumption.”* The FDA document - *“Guidance for Industry, Manufacture and Labeling of Raw Meat Foods for Companion and Captive Noncompanion Carnivores and Omnivores”* [9] is not a law, it is a recommendation by FDA to raw pet food manufacturers. As well this FDA Guidance Document recommends raw pet food manufacturers follow Good Manufacturing Practices of human food. No other style of pet food has received this FDA recommendation, only raw pet food.

This is a good standard to set for any style of pet food, however not all raw pet food manufacturers follow this FDA guidance. As example: In 2020 the FDA issued a warning letter to raw pet food manufacturer Bravo Packing (not affiliated with Bravo Pet Food). [12] An excerpt of that warning stated: *“You did not hold animal food for distribution under conditions that protect against contamination and minimize deterioration. You did not take effective measures to exclude pests from the packing area and to protect against the contamination of animal food by pests.”*

Raw Pet Food Recall History

Per FDA Enforcement Report records [13], over the last ten years (2012 through 2021):

- Raw pet foods were responsible for 1.2% of all pathogenic bacteria recalls. By comparison, kibble pet foods were responsible for 98% of all pathogenic bacteria recalls in the same time frame.

Raw Pet Food Percentage of Market compared to Percentage of Recalls in 2021

According to industry statistics [5], refrigerated and frozen style pet foods sales in the US were:

4%*

of all pet food sales in 2021.

*Sales percentage includes all refrigerated and frozen style pet foods, cooked and raw.



According to FDA Enforcement Report records [13], 20,952 pounds of raw pet foods were recalled in 2021. Raw pet foods recalled were:

0.02%*

of all recalls (pounds) in 2021.

*Recall percentage includes all refrigerated and frozen style pet foods, cooked and raw.

Considerations for feeding raw pet foods

Question quality of ingredients

Just as with any style of pet food, some raw pet foods utilize human grade ingredients and some raw pet foods are sourced from inferior quality ingredients. Ask your manufacturer for a guarantee: 1) Do you guarantee all food ingredients are human edible quality?, 2) Do you guarantee all supplements are human edible quality? The manufacturer might use some human edible quality ingredients and some feed grade quality, if so, ask them to clarify which ingredients are human grade and which are feed grade. With this information, pet owners can make informed purchasing decisions.

Safe Handling

Raw pet foods have been given the undeserved reputation of being at greatest risk for pathogenic bacteria contamination. This is not true. As evidenced in FDA recall data, kibble pet foods are of a far greater risk than raw pet foods for pathogenic bacteria. Most pet owners that provide their pet a raw diet practice the same safe handling procedures as with any raw meat. The FDA provides this safe handling advice for all styles of pet food [14]:

Tips for Buying Pet Food

Buy pet food products (cans, pouches, or bags) that are in good condition. Check the packaging for visible signs of damage, such as dents, tears, and discolorations.

Tips for Preparing Pet Food

Begin and end with clean hands. Both before and after handling pet food and treats, wash your hands for at least 20 seconds with soap and hot water.

Wash pet food bowls and scooping utensils with soap and hot water after each use.

Do not use your pet's food bowl as a scooping utensil. Use a clean scoop, spoon, or cup instead. Use the scooping utensil only for scooping pet food.

Testing

The safety of any pet food depends on diligent testing of ingredients and the finished pet food. Some manufacturers require certificates of analysis when receiving every ingredient, others do not. Ask your manufacturer what consistent testing is performed on ingredients and what consistent testing is performed on finished pet foods; ask what tests are performed, and how often.

Dehydrated/Freeze Dried Pet Food

What is the legal definition of Dehydrated or Freeze Dried Pet Food?

Dehydrated is legally defined as a process, *“having been freed of moisture by thermal means.”* The process of freeze dried pet food is not legally defined.

Human Grade or Feed Grade Dehydrated/Freeze Dried Pet Food Options

Both of these styles of pet foods are available as Human Grade or Feed Grade.

Dehydrated/Freeze Dried Pet Food Potential Concerns

Because Freeze Dried is not legally defined, there is potential for manufacturers to use multiple different methods to manufacture the pet food. It is unknown if different production processes are used or if those processes cause variations in the final pet food products.

Dehydrated/Freeze Dried Pet Food Recall History

Per FDA Enforcement Report data, over the last ten years (2012 through 2021):

- Dehydrated or freeze dried pet foods were responsible for 0.02% of all recalled pet foods (67,652 pounds).
- All recalls were for pathogenic bacteria contamination.

Dehydrated/Freeze Dried Pet Food Percentage of Market compared to Percentage of Recalls in 2021

There are no industry statistics for this style of pet food sales in 2021.

There were no recalls for this style of pet food in 2021.

Considerations for feeding dehydrated/freeze dried pet foods

Question quality of ingredients

Just as with any style of pet food, some dehydrated/freeze dried pet foods utilize human grade ingredients and some source inferior quality ingredients. Ask your manufacturer for a guarantee: 1) Do you guarantee all food ingredients are human edible quality?, 2) Do you guarantee all supplements are human edible quality? The manufacturer might use some human edible quality ingredients and some feed grade quality, if so, ask them to clarify which ingredients are human grade and which are feed grade. With this information, pet owners can make informed purchasing decisions.

Safe Handling

As with any style of pet food, safe handling practices should be implemented. The FDA provides this advice for all styles of pet food [14]:

Tips for Buying Pet Food

Buy pet food products (cans, pouches, or bags) that are in good condition. Check the packaging for visible signs of damage, such as dents, tears, and discolorations.

Tips for Preparing Pet Food

Begin and end with clean hands. Both before and after handling pet food and treats, wash your hands for at least 20 seconds with soap and hot water.

Wash pet food bowls and scooping utensils with soap and hot water after each use.

Do not use your pet's food bowl as a scooping utensil. Use a clean scoop, spoon, or cup instead. Use the scooping utensil only for scooping pet food.

Testing

The safety of any pet food depends on diligent testing of ingredients and the finished pet food. Some manufacturers require certificates of analysis when receiving every ingredient, others do not. Ask your manufacturer what consistent testing is performed on ingredients and what consistent testing is performed on finished pet foods; ask what tests are performed, and how often.

Cooked Pet Food

What is the legal definition of Cooked Pet Food?

There is no legal definition of the process for cooked, sold refrigerated or frozen pet products. This style of pet food is different from canned pet foods in that these products are sold frozen or refrigerated (instead of shelf stable options such as cans or tetra paks).

Human Grade or Feed Grade Cooked Pet Food Options

This style of pet food has more options available of Human Grade pet foods than other styles of pet food, however the Feed Grade cooked pet food options outnumber the Human Grade options.

Cooked Pet Food Potential Concerns

As with other styles of pet food, feed grade cooked pet foods can vary dramatically in quality of ingredients and manufacturing safety standards while alluding in advertising they are human grade.

Recall History

Per FDA Enforcement Report data, over the last ten years (2012 through 2021):

- Cooked pet foods were responsible for 0.14% of all recalled pet foods (469,798 pounds).
- Cause of recalls were for pathogenic bacteria contamination, excess vitamin D and mold.

Cooked Pet Food Percentage of Market compared to Percentage of Recalls in 2021

According to industry statistics [5], refrigerated and frozen style pet foods sales in the US were:

4%*
of all pet food sales in 2021.

*Sales percentage includes all refrigerated and frozen style pet foods, cooked and raw.



According to FDA Enforcement Report records [13], 120,366 pounds of cooked pet foods were recalled in 2021, all for pathogenic bacteria contamination.

Cooked pet foods recalled were:

0.02%*
of all recalls (pounds) in 2021.

*Recall percentage includes all refrigerated and frozen style pet foods, cooked and raw.

Considerations for feeding cooked pet foods

Question quality of ingredients

Just as with any style of pet food, some cooked pet foods utilize human grade ingredients and some source inferior quality ingredients. Ask your manufacturer for a guarantee: 1) Do you guarantee all food ingredients are human edible quality?, 2) Do you guarantee all supplements are human edible quality? The manufacturer might use some human edible quality ingredients and some feed grade quality, if so, ask them to clarify which ingredients are human grade and which are feed grade. With this information, pet owners can make informed purchasing decisions.

Safe Handling

As with any style of pet food, safe handling practices should be implemented. The FDA provides this advice for all styles of pet food [14]:

Tips for Buying Pet Food

Buy pet food products (cans, pouches, or bags) that are in good condition. Check the packaging for visible signs of damage, such as dents, tears, and discolorations.

Tips for Preparing Pet Food

Begin and end with clean hands. Both before and after handling pet food and treats, wash your hands for at least 20 seconds with soap and hot water.

Wash pet food bowls and scooping utensils with soap and hot water after each use.

Do not use your pet's food bowl as a scooping utensil. Use a clean scoop, spoon, or cup instead. Use the scooping utensil only for scooping pet food.

Testing

The safety of any pet food depends on diligent testing of ingredients and the finished pet food. Some manufacturers require certificates of analysis when receiving every ingredient, others do not. Ask your manufacturer what consistent testing is performed on ingredients and what consistent testing is performed on finished pet foods; ask what tests are performed, and how often.

What is the legal definition of Therapeutic Pet Food?

Therapeutic pet food diets, also known as prescription pet foods, are the only style of pet food allowed to make a claim to cure or treat disease. The FDA gives these pet diets special privileges not provided to any other product (for humans or pets). There is no legal definition of therapeutic pet food.

Therapeutic diets are currently available in kibble, can, and cooked styles.

Human Grade or Feed Grade Therapeutic Pet Food Options

Almost all therapeutic pet diets are Feed Grade. As of the publication of this document, only a few Human Grade manufacturers produce therapeutic diets.

Therapeutic Pet Food Potential Concerns

Through Compliance Policy Guide "Sec. 690.150 Labeling and Marketing of Dog and Cat Food Diets Intended to Diagnose, Cure, Mitigate, Treat, or Prevent Diseases" [10], the FDA allows these pet foods to make drug claims (to cure or treat disease) without meeting the legal requirements of a drug. As example, a drug is required by federal law to meet strict manufacturing safety standards and provide documented evidence the drug is effective and safe. A therapeutic or prescription pet food is not required to meet these same legal standards. Unlike drugs required to be manufactured under pristine conditions, these diets are allowed to be manufactured in feed grade facilities, using feed grade ingredients (including illegal per federal law ingredients). No feeding trial evidence the diet is effective and/or safe is required to be submitted to FDA prior to distribution.

Many therapeutic diets are not complete and balanced, they do not meet the full nutritional requirements for cats or dogs. Because these diets are legally required to be only sold via a veterinarian recommendation (not officially a prescription), it is expected the veterinarian will oversee their use long term to address any nutritional insufficiencies.

Recall History

In 2019, Hill's Pet Food therapeutic diets were included in a large recall for excess vitamin D. The FDA did not release data for pounds recalled of each style of pet food, however in total Hill's recalled 1,445,202 cases - an estimated 11 million pounds.

Therapeutic Pet Food Percentage of Market compared to Percentage of Recalls in 2021

There are no industry statistics for this style of pet food sales in 2021.

There were no recalls for this style of pet food in 2021.

Considerations for feeding therapeutic pet foods

Question quality of ingredients

To address an illness, often pet owners have little options other than providing their pet with a therapeutic diet. However this does not mean that pet owners are forced to provide a feed grade therapeutic diet. Ask your veterinarian for options to human grade diets or home prepared diets that address the requirements of the illness.

Safe Handling

As with any style of pet food, safe handling practices should be implemented. The FDA provides this advice for all styles of pet food [14]:

Tips for Buying Pet Food

Buy pet food products (cans, pouches, or bags) that are in good condition. Check the packaging for visible signs of damage, such as dents, tears, and discolorations.

Tips for Preparing Pet Food

Begin and end with clean hands. Both before and after handling pet food and treats, wash your hands for at least 20 seconds with soap and hot water.

Wash pet food bowls and scooping utensils with soap and hot water after each use.

Do not use your pet's food bowl as a scooping utensil. Use a clean scoop, spoon, or cup instead. Use the scooping utensil only for scooping pet food.

Testing

The safety of any pet food depends on diligent testing of ingredients and the finished pet food. Some manufacturers require certificates of analysis when receiving every ingredient, others do not. Ask your manufacturer what consistent testing is performed on ingredients and what consistent testing is performed on finished pet foods; ask what tests are performed, and how often.

What are the Legal Requirements of Pet Food Names?

Applicable to all styles and grades of pet food, words within the name of a product have specific legal meanings and give pet owners indications to how much of a particular named ingredient is required to be included in the pet food.

Example Pet Food Name	Legal requirements and example for dry and wet foods
Chicken Formula Pet Food 1 named ingredient + descriptor = 10% of named ingredient	Regulations state that pet food names that include the descriptor Formula, Dinner, Platter, Entree and Recipe – along with an ingredient in the product name (in this example 'Chicken') to consist of a minimum of 10% of the stated ingredient. Dry foods: A 10 pound bag of pet food named Chicken Formula is required to contain only 1 pound of chicken. Wet foods: A 10 ounce container of pet food named Chicken Dinner is required to contain only 1 ounce of chicken.

Chicken & Rice Pet Food 2 or more named ingredients = 3% of each named ingredient	Pet food regulations state that pet foods that include two or more ingredients in the name of the product, are only required to include 3% minimum of the stated ingredients. Dry foods: A 10 pound bag of pet food named Chicken & Rice is required to contain only 4.8 ounces of chicken. Wet foods: A 10 ounce container of pet food named Chicken & Rice is required to contain only 0.3 ounces of chicken.
--	--

Pet Food with Chicken 'With' + named ingredient = 3% of named ingredient	Pet food regulations state that product names that include the word " with " are required to consist of only 3% minimum of the stated ingredient. Dry foods: A 10 pound bag of pet food named 'with Chicken' is required to contain only 4.8 ounces of chicken. Wet foods: A 10 ounce container of pet food named Chicken & Rice is required to contain only 0.3 ounces of chicken.
--	--

Chicken Flavor Pet Food Flavor + named ingredient = 0% of named ingredient	Regulations allow a pet food with the descriptor ' Flavor ' stated in the product name to include no (zero) amount of the stated ingredient.
--	---

References

1. AAFCO Meeting Minutes, definition of Human Grade. Source: https://www.aafco.org/Portals/0/SiteContent/Regulatory/Committees/Ingredient-Definitions/Minutes/Ingredient_Definitions_Minutes_2016_Midyear_Isle_of_Palms.pdf
2. AAFCO Meeting Minutes, definition of Human Grade. Source: https://www.aafco.org/Portals/0/SiteContent/Regulatory/Committees/Ingredient-Definitions/Minutes/Ingredient_Definitions_Minutes_2016_Midyear_Isle_of_Palms.pdf
3. FDA response to Association for Truth in Pet Food. Source: <https://www.regulations.gov/docket/FDA-2016-P-3578/document> See document titled "Final Response - Letter from FDA CVM to AssociationforTruthinPetFood.com".
4. FDA inspection report of Mars Petcare facility: <https://truthaboutpetfood.com/wp-content/uploads/2018/07/MarsEIR2017.pdf>
5. Pet food industry 2021 sales statistics. Source: <https://www.petfoodprocessing.net/articles/15310-state-of-the-us-pet-food-and-treat-industry-2021>
6. Global Alliance of Pet Food Manufacturers. Source: https://gapfa.org/files/download/9_GAPFA_Factsheet_How_pet_food_is_made.pdf
7. Archived FDA Rendered Pet Food Ingredients Compliance Policy. <https://web.archive.org/web/20180423161328/https://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074717.htm>.
8. Archived FDA Canned Pet Food Compliance Policy. <https://web.archive.org/web/20180423160159/https://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074710.htm>.
9. FDA Guidance on Raw Pet Food. <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-122-manufacture-and-labeling-raw-meat-foods-companion-and-captive-noncompanion-carnivores>
10. FDA Compliance Policy for pet diets to treat, cure, or mitigate disease. <https://www.fda.gov/media/83998/download>
11. FDA description of Complete and Balanced Pet Food. <https://www.fda.gov/animal-veterinary/animal-health-literacy/complete-and-balanced-pet-food>
12. FDA Warning Letter to Bravo Packing pet food. <https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/bravo-packing-inc-592718-03162020>
13. FDA Enforcement Report Database. <https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/enforcement-reports>
14. FDA Safe Handling Tips. <https://www.fda.gov/animal-veterinary/animal-health-literacy/tips-safe-handling-pet-food-and-treats>
15. Center for Science in the Public Interest, Food Dyes a Rainbow of Risks. <https://www.cspinet.org/resource/food-dyes-rainbow-risks>