

Pet food consumers are denied the right to access pet food ingredient definitions through an agreement between FDA and AAFCO (Memorandum of Understanding agreement). Pet food ingredient definitions are solely owned by AAFCO (Association of American Feed Control Officials) and copyright protected. Consumers are forced to pay AAFCO \$110.00 per year in order to access pet food ingredient definitions. This is a violation of consumer Freedom of Information rights. Unlike with any other consumable product, pet food consumers are provided with no public access to regulations and definitions that involve their pet's food. This document is provided to pet food consumers as a resource to understand pet food regulations and ingredient definitions.

This document is based on the Model Bills and legal definitions published in the AAFCO Official Publication. All content is accurate and written in consumer language (not legal language).

This document is solely for pet food consumers

# PET FOOD REGULATIONS & INGREDIENT DEFINITIONS FOR CONSUMERS

# Regulations

All laws across the US are public information, except pet food laws. Some minimal information is posted on the FDA website, some minimal information is posted on various State Department of Agriculture websites. The majority of the regulations/laws that govern pet food is published in the AAFCO Official Publication which consumers have no free access to. Below you'll find some of the more significant pet food regulations rewritten in consumer language.



## Pet Food Labels and Websites

AAFCO/FDA regulations require pet food labels and websites (websites are considered an extension to the label) to include particular information with intent to provide the consumer with sufficient information to make purchase decisions. The required 'sufficient' label information is:

- Product and Brand name
- Species statement (cat food or dog food)
- Quantity statement (weight)
- Guaranteed Analysis (disclosing protein and fat % minimum, fiber and moisture % maximum)
- Ingredient list (per AAFCO/FDA definitions)
- Nutritional adequacy (if the pet food is 'Complete' providing all nutrients per AAFCO/FDA nutritional requirements or if the pet food is 'Supplemental' which does not meet the AAFCO/FDA nutritional requirements)
- Feeding directions (not held to any regulatory guidelines, feeding directions are at manufacturer discretion)
- Name and address of brand (not the actual manufacturer and not contact information)

Images on pet food labels are required by AAFCO/FDA regulations to be a truthful representation of the ingredients within the pet food. However, this specific regulation is never enforced.

Statements on pet food labels and pet food websites are required by regulation to be truthful. However, regulatory authorities rarely (if ever) verify claims on pet food websites.

## Illegal and Legal

On the FDA website consumers will find "Compliance Policies" that FDA uses as guidance to regulate pet food. Quoting one (of many) FDA policies:

**"Pet food consisting of material from diseased animals or animals which have died otherwise than by slaughter...will be considered fit for animal consumption."**

Material from "diseased animals or animals which have died otherwise than by slaughter" is a direct violation of federal law. Though it is difficult to understand how and why FDA and each State Department of Agriculture ignore federal and state laws, consumers must be aware that authorities DO allow this in pet food. There is no warning on pet food labels alerting consumers to the potential of illegal/risk ingredients.

Consumer advocates continue to question authorities on these issues. Authorities continue to stall, failing to fully explain how illegal/adulterated pet foods and treats can be sold to unknowing consumers.

Not all pet foods violate law. Some use only food quality ingredients and manufacture according to food safety standards. However consumers struggle to determine which product is safe/legal and which is not.

Existing regulations classify all pet foods into two separate categories: Feed Grade or Human Grade (these terms are fully explained on following pages). Briefly, 'human grade' pet foods are required to abide by all food safety laws, 'feed grade' pet foods are not required to abide by food safety law (they might, but they are not required to). Unfortunately, both categories are termed 'pet food' (cat food or dog food) on product labels.

# Pet Food Ingredient Definitions

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**There is not one pet food ingredient that is required by its AAFCO/FDA definition to be similar to the same ingredient in human food.**

**There is not one AAFCO/FDA pet food ingredient definition that requires the ingredient to abide by federal law.**

All laws across the US are public information including legal definitions, except pet food definitions. On the following pages you'll find pet food ingredient definitions based on the legal definitions rewritten in consumer language.

The ingredients used in pet foods and treats each have their own specific definition written by and owned by AAFCO (in cooperation with FDA). Pet food ingredients are NOT the same as human food ingredients. Each pet food ingredient has its own definition specific to pet food/animal feed. These definitions are published yearly in the AAFCO Official Publication, cost to consumers \$110.00 (per year).

Pet food manufacturers are not required to disclose to consumers if ingredients included in a pet food are human grade or an inferior and in some cases illegal AAFCO/FDA allowed alternative ingredient. Consumers can trust that 'Human Grade' pet foods (stated on the label) contain 100% human grade ingredients and supplements. For all other pet foods, ask the manufacturer questions regarding ingredient quality.

# Pet Food Ingredient Definitions

Key to symbols found in ingredient descriptions:



This symbol indicates the meat ingredient is not required by the AAFCO/FDA definition to be sourced from a slaughtered animal as federal food safety law requires. Pet food meat sourced from a non-slaughtered animal is of significant risk.

Federal law defines a food as adulterated *“if it is, in whole or in part, the product of a diseased animal or of an animal which has died otherwise than by slaughter.”* Meats sourced from non-slaughtered animals would be a direct violation of this federal law.

Pet foods using these ingredients are not guaranteed to use non-slaughtered animal meat. It only means they are allowed to use non-slaughtered animal meat by AAFCO/FDA.



This symbol indicates the meat ingredient is required by the AAFCO/FDA definition to be sourced from a slaughtered animal, but is not required to be sourced from a USDA inspected and approved slaughtered animal as federal food safety law requires. To confuse things further, there is no AAFCO definition of slaughter, thus the requirement to be sourced from a 'slaughtered animal' is unclear in meaning.

Federal law defines a food as adulterated *“if it is, in whole or in part, the product of a diseased animal or of an animal which has died otherwise than by slaughter.”* Diseased meat from non-USDA approved animal sources would be a direct violation of this federal law.

Pet foods using these ingredients are not guaranteed to use non-USDA approved animal meat. It only means they are allowed to use non-USDA approved animal meat by AAFCO/FDA.



Consumers are not provided with clarification to what quality of ingredients are included in the pet food they are purchasing. This section provides an example question to send to your pet food manufacturer regarding quality.

Also this section provides an example statement to send your State Department of Agriculture regarding the enforcement of law with pet food. Consumer action can help make pet food safer.

# Pet Food Definitions

## Human Grade

Individual ingredients  
Final product - food or treat

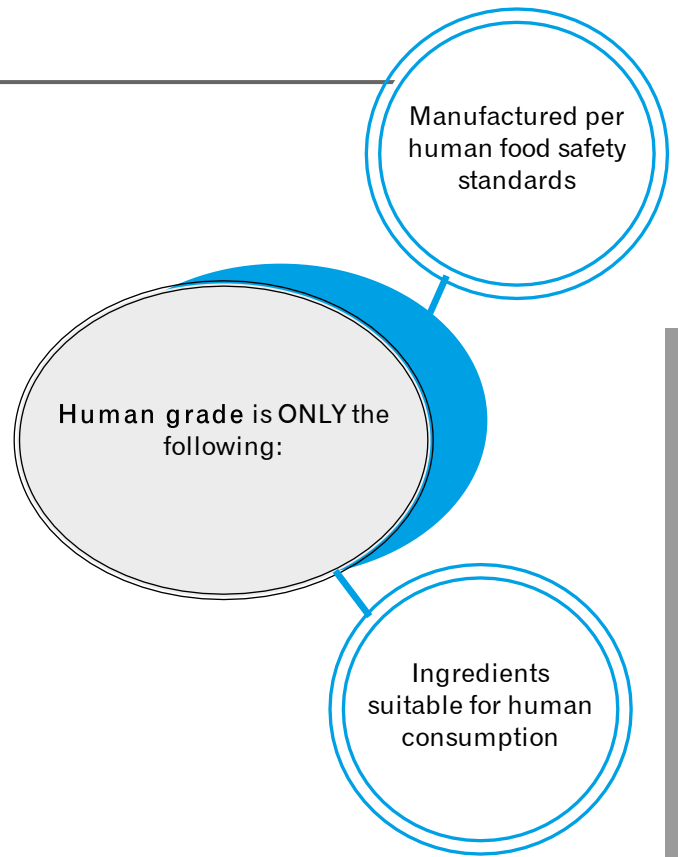
Human grade pet foods are 'food' formulated for pet consumption. The AAFCO/FDA definition of Human Grade pet products requires all food safety standards of food to be met;

- manufacturing per human food regulation
- warehousing per human food regulation
- and ingredient quality (including supplements) to be human edible.

Per regulation, this term is **ONLY** allowed to be used when referencing the complete/final product (treats or pet food). As example regulation does not allow manufacturers to state human grade ingredients **IF** the whole product does not meet the human grade manufacturing and warehousing requirements.

Human grade is considered a voluntary claim. In other words, it is accepted by regulatory that all pet foods are feed grade unless a manufacturer volunteers to meet the quality standards of human grade.

Consumers can trust a Human Grade claim on a pet food label – regulatory authorities scrutinize wording on pet food labels. **Consumers cannot trust a Human Grade claim on a pet food website – regulatory authorities do not scrutinize pet food websites.**



# Pet Food Definitions

## Feed Grade

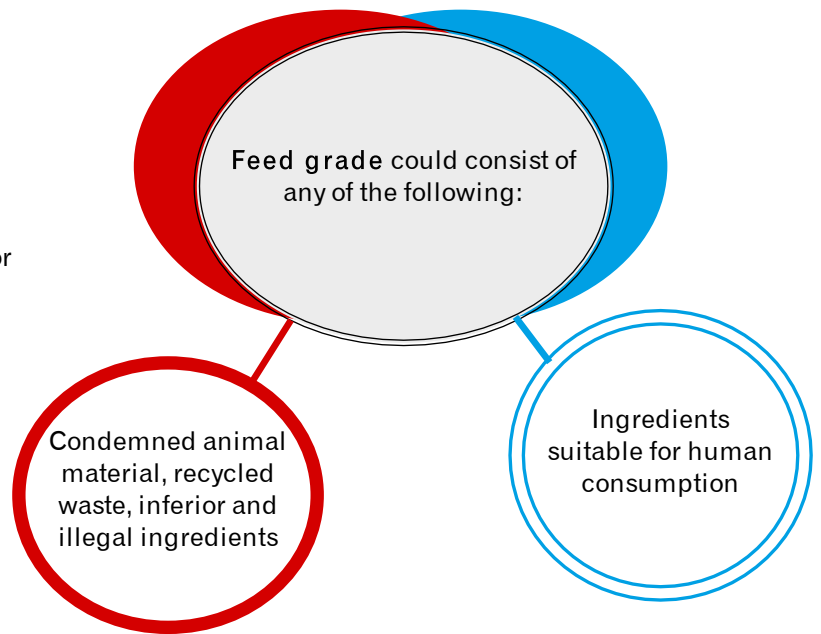
Individual ingredients  
Final product - food or treat

Ingredients or final product (treats or pet food) that is specifically intended for animals. Ingredients or final product are not required to be suitable for human consumption. The AAFCO/FDA definition of feed grade actually allows ingredients to violate federal or state law per FDA Compliance Polices or individual State authority.

Consumers are never informed if ingredients in a pet food violate law. Pet food manufacturers are not required to disclose feed grade quality on pet food labels or websites.

All pet food/treat products are termed 'food'; this is misleading. Unless a pet food meets requirements of Human Grade claim - it is not food, it is feed/feed grade.

Consumer advocates have requested FDA require feed grade pet foods to be labeled as feed (example Cat Feed or Dog Feed), we are waiting on their decision.



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The AAFCO/FDA definition of Feed Grade allows products/ingredients to violate US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - if ingredients are feed grade or food grade.

Ask your State Department of Agriculture to enforce federal law with pet food.

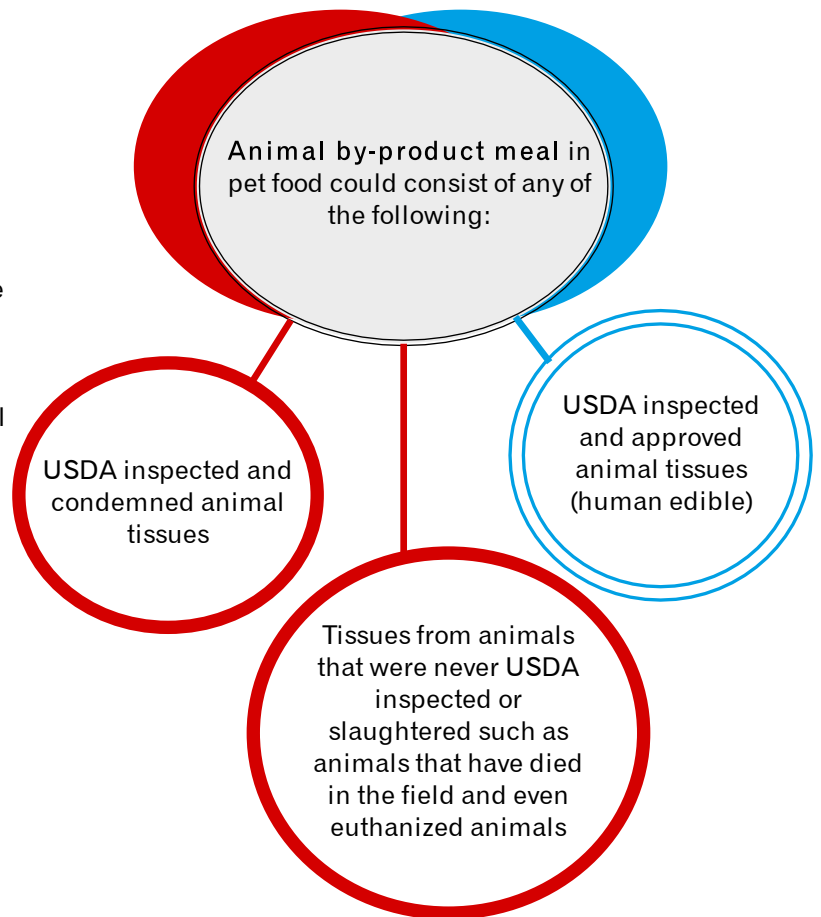
# Pet Food Ingredient Definitions

## Animal By-Product Meal

Beef by-product meal  
Lamb by-product meal  
Venison by-product meal  
Pork by-product meal

A rendered (cooked prior to manufacturing of pet food) ingredient. The AAFCO/FDA definition allows slaughtered or non-slaughtered whole animal carcasses or any part of the animal including horn, hoof, hide and intestines (definition allows feces to be included). Any animal species is allowed in this ingredient.

Species source is required to be declared on the label (example Beef by-product meal) or if multiple animal species included ingredient is declared on the label as Animal by-product meal.



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The AAFCO/FDA definition of Animal by-product meal is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that animal by-product meal is sourced from USDA inspected and approved animal tissues. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animal tissues.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that Animal by-product meal be required to be sourced from USDA inspected and approved animal ingredients.

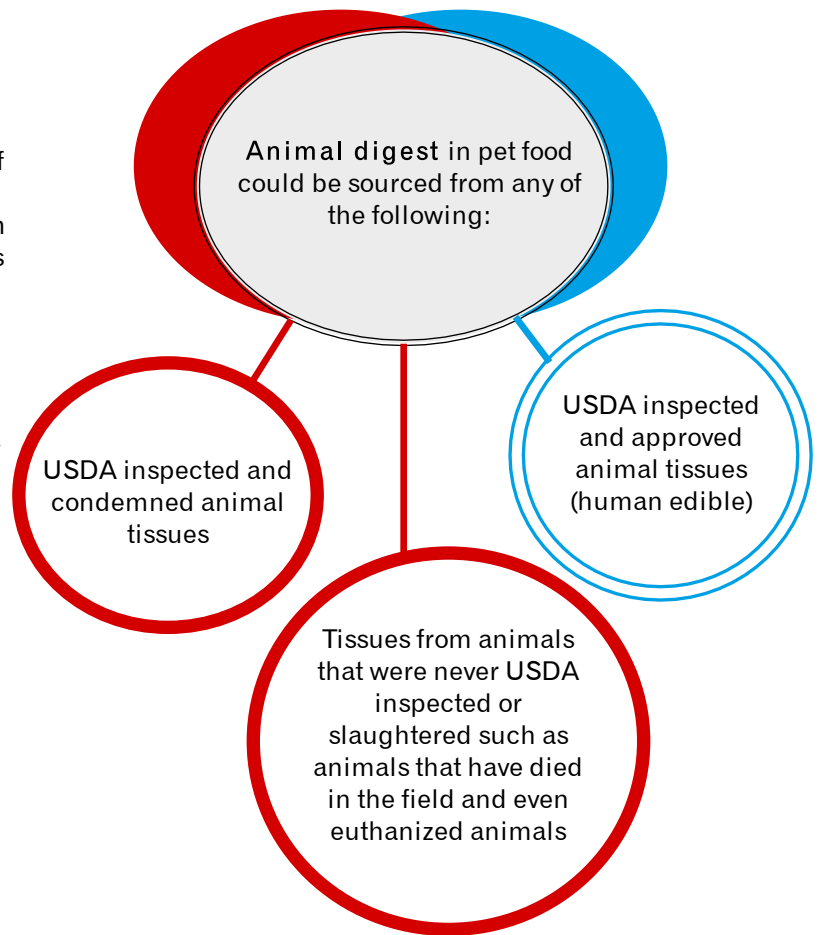
# Pet Food Ingredient Definitions

## Animal Digest

Beef digest  
Lamb digest  
Venison digest  
Pork digest

Animal digest is material sourced from any species of slaughtered or non-slaughtered animal carcass or animal part that has been partially processed through chemicals and water – hydrolysis. Animal digest does not include hair, horn, hoofs. Any animal species is allowed in this ingredient.

Animal digest can be stated on the label as species specific such as '**Beef digest**' but is most commonly stated on the label as '**Animal digest**' including multiple species of animal sources.



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The AAFCO/FDA definition of Animal digest is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that animal digest is sourced from USDA inspected and approved animal tissues. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animal tissues.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that Animal digest be required to be sourced from USDA inspected and approved animal ingredients.



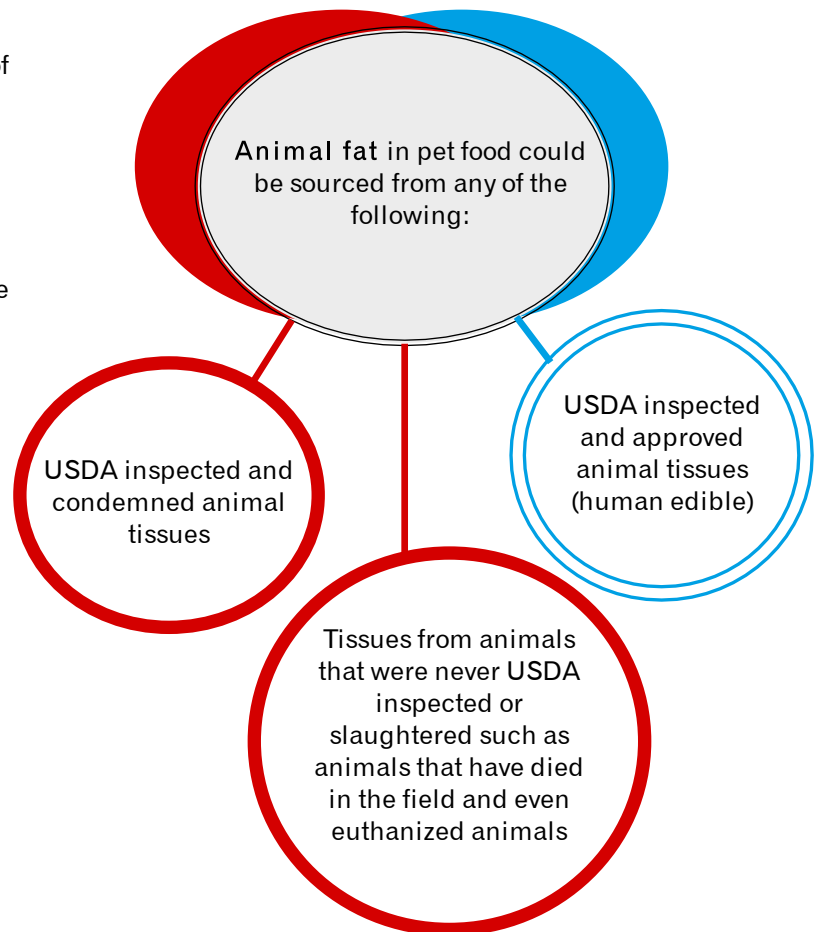
# Pet Food Ingredient Definitions

## Animal Fat

### Chicken Fat

Animal fat is obtained from the rendering (cooking) of slaughtered or non-slaughtered animal proteins, the fat is separated from the meat/protein material. Any animal species is allowed in this ingredient.

Animal Fat could be stated on the label species specified such as 'Chicken Fat' or if it is a combination of animal species would be stated on the label as 'Animal Fat'.



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The AAFCO/FDA definition of Animal fat is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that animal fat is sourced from USDA inspected and approved animal tissues. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animal tissues.

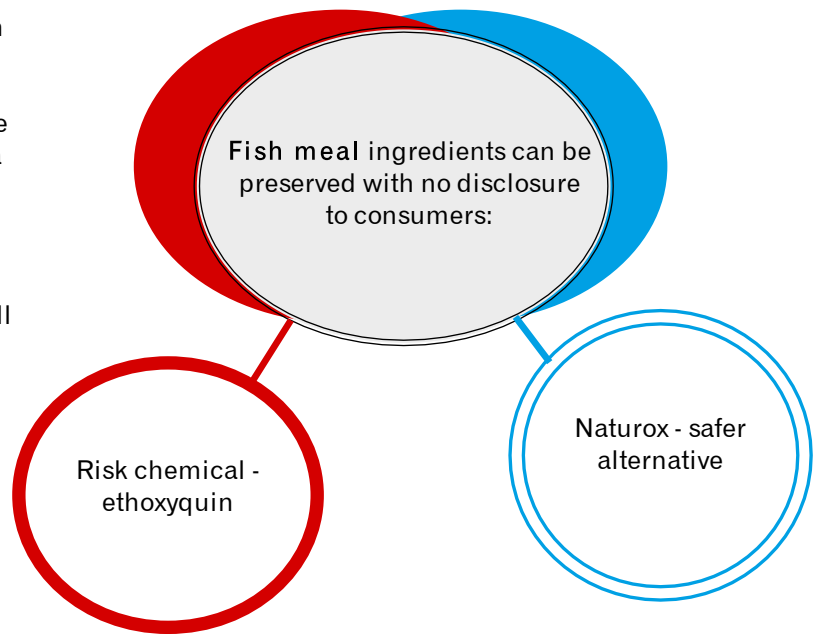
Ask your State Department of Agriculture to enforce federal law with pet food; ask that Animal fat be required to be sourced from USDA inspected and approved animal ingredients.

# Pet Food Ingredient Definitions

## Fish Meal

The AAFCO/FDA definition of fish meal is not defined to any specific type of fish, any fish is allowed. Meal in this instance implies the fish/fish parts were dried prior to the manufacture of the pet food; there is no restrictions/requirements to how product is dried. The ingredient can contain whole fish or fish cuttings or a combination of both.

If one species of fish is used, it is required to be described as such on the label; example: Menhaden Fish Meal. If more than one species the ingredient will be listed as Fish Meal.



### Take Action

Ask your pet food manufacturer for a guarantee - in writing - that the fish meal is preserved without the use of ethoxyquin. Ethoxyquin is a risk preservative linked to multiple health concerns.

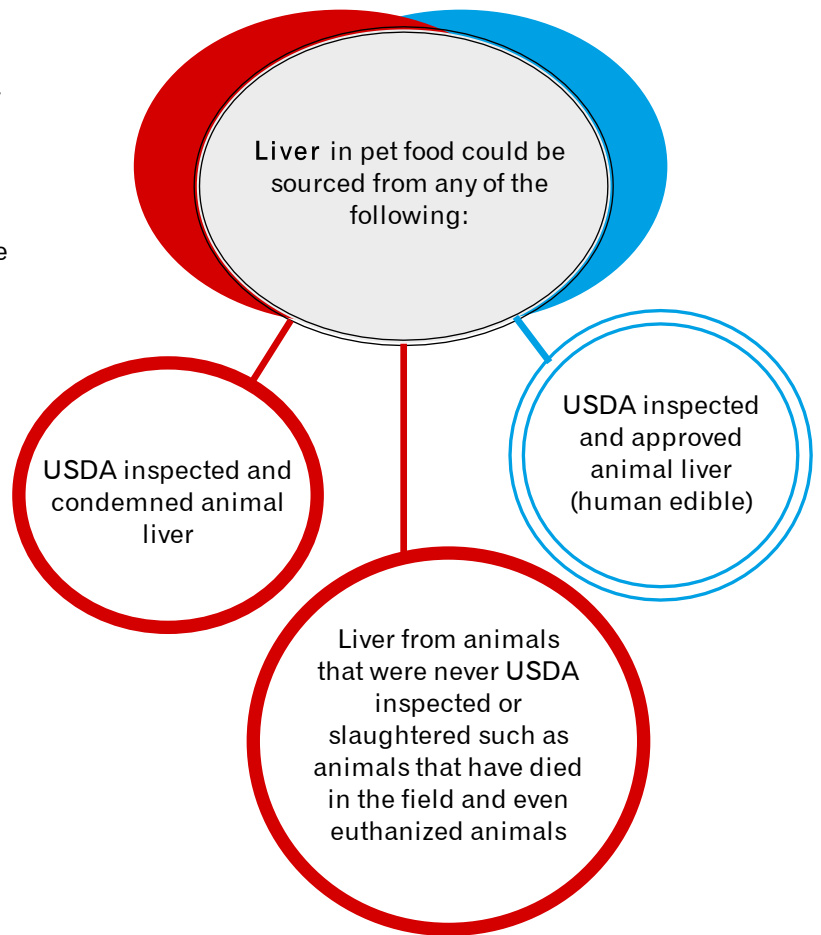
# Pet Food Ingredient Definitions

## Liver

Chicken liver  
Beef liver

Animal organ meat sourced from slaughtered or non-slaughtered animals.

Liver could be stated on the label species specified such as 'Chicken Liver' or 'Beef Liver' or if it is a combination of animal species would be stated on the label as 'Liver'.



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The AAFCO/FDA definition of Liver is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that liver is sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animal.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that liver be required to be sourced from USDA inspected and approved animals.

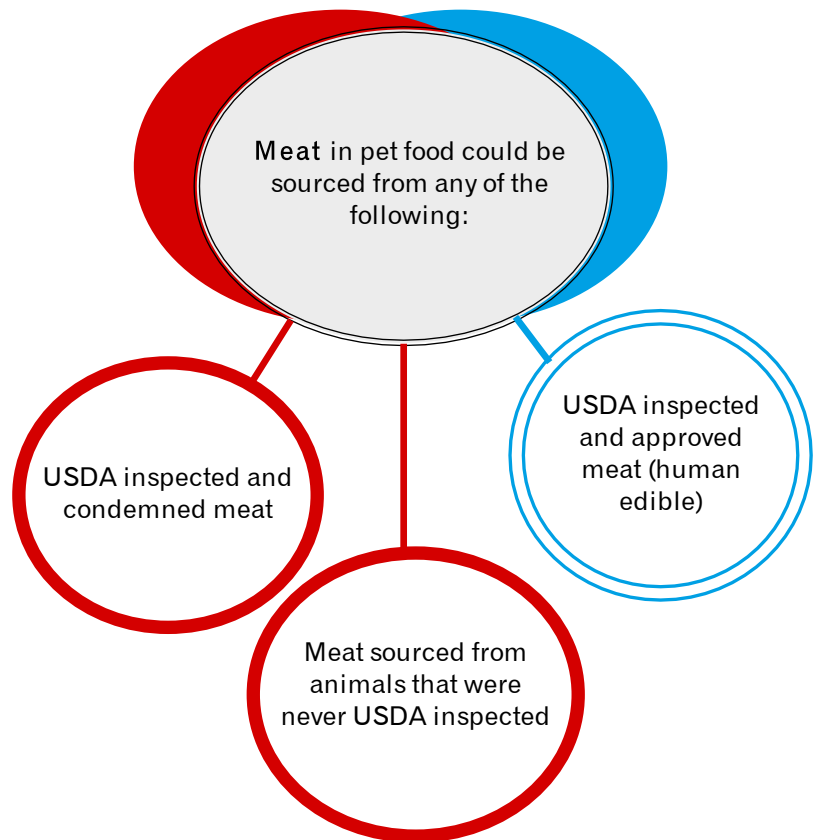
# Pet Food Ingredient Definitions

## Meat

Beef  
Lamb  
Pork  
Venison

Meat in pet food is flesh from slaughtered mammals, does not include bone, and can include parts of the animal not typically understood as meat in human food, such as the tongue or heart.

Meat would be stated on the label species specified such as 'Beef' or 'Lamb'.



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The AAFCO/FDA definition of Meat in pet food is required to be sourced from a slaughtered animal, but is not required to be sourced from a USDA inspected and approved slaughtered animals as federal food safety law requires.

**This pet food ingredient is not in accordance with US federal law.**

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that meat is sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animal.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that meat be required to be sourced from USDA inspected and approved animals.

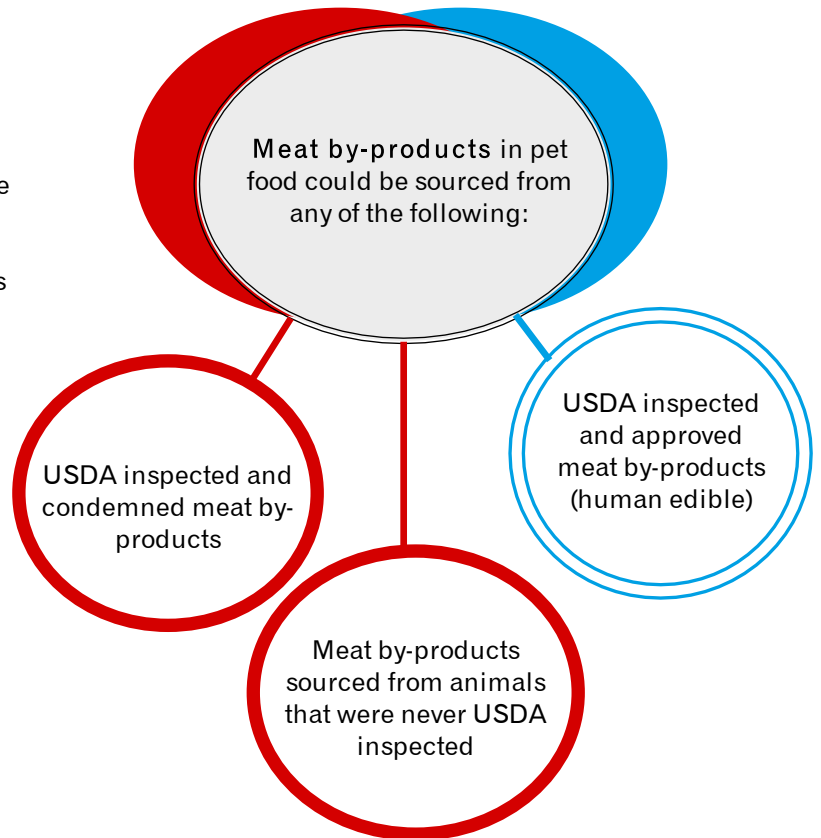
# Pet Food Ingredient Definitions

## Meat By-Products

- Beef by-products
- Lamb by-products
- Pork by-products
- Venison by-products

Meat by-products are defined as non-meat; can include lungs, stomach, and intestines (required to be freed of feces) from slaughtered mammals.

Meat by-products could be stated on the label species specified such as 'Beef by-products' or 'Lamb by-products' or if it is a combination of animal species would be stated on the label as 'Meat by-products'.



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The AAFCO/FDA definition of Meat by-products in pet food is required to be sourced from a slaughtered animal, but is not required to be sourced from a USDA inspected and approved slaughtered animals as federal food safety law requires.

**This pet food ingredient is not in accordance with US federal law.**

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that meat by-products are sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animal.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that meat by-products be required to be sourced from USDA inspected and approved animals.

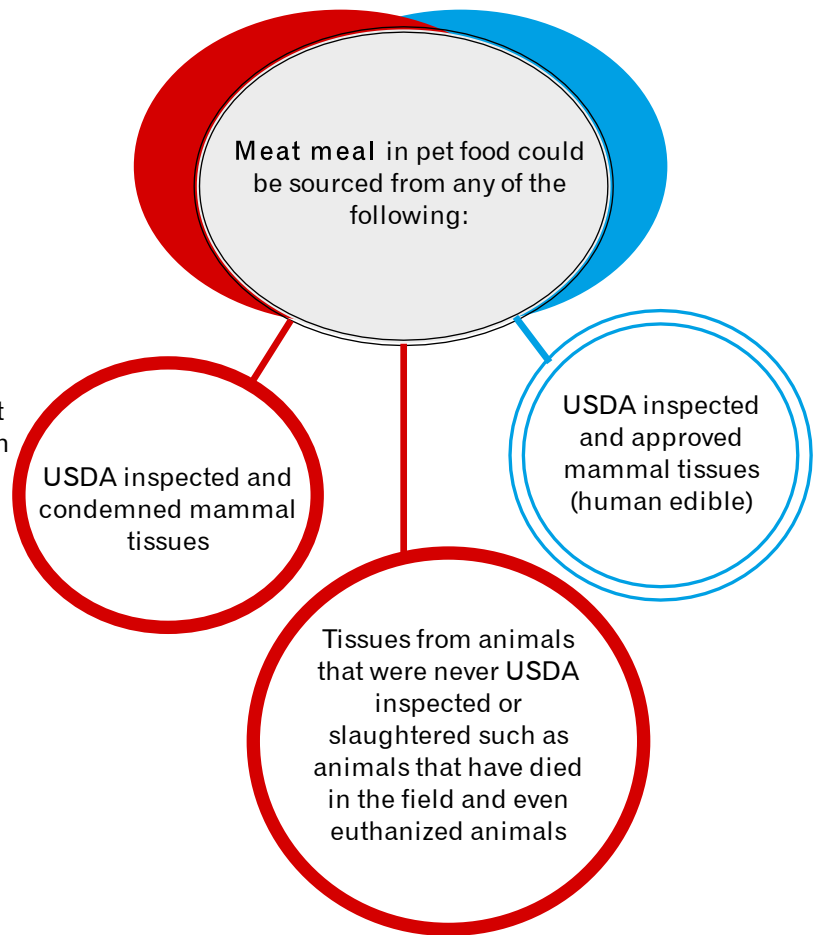
# Pet Food Ingredient Definitions

## Meat Meal

- Beef meal
- Lamb meal
- Pork meal
- Venison meal

A rendered (cooked prior to manufacturing of pet food) ingredient. The AAFCO/FDA definition of meat meal specifies the ingredient is slaughtered or non-slaughtered mammal tissues, but allows non-tissue material such as horn, hoof, hide and intestines with feces (definition allows feces to be included).

Meat meal would be stated on the label species specified such as 'Beef meal' or 'Lamb meal' or if it is a combination of animal species would be stated on the label as 'Meat meal'.



The AAFCO/FDA definition of Meat meal is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

### Take Action

Ask your pet food manufacturer for a guarantee - in writing - that meat meal is sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should ONLY be sourced from USDA inspected and approved animals.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that meat meal be required to be sourced from USDA inspected and approved animals.

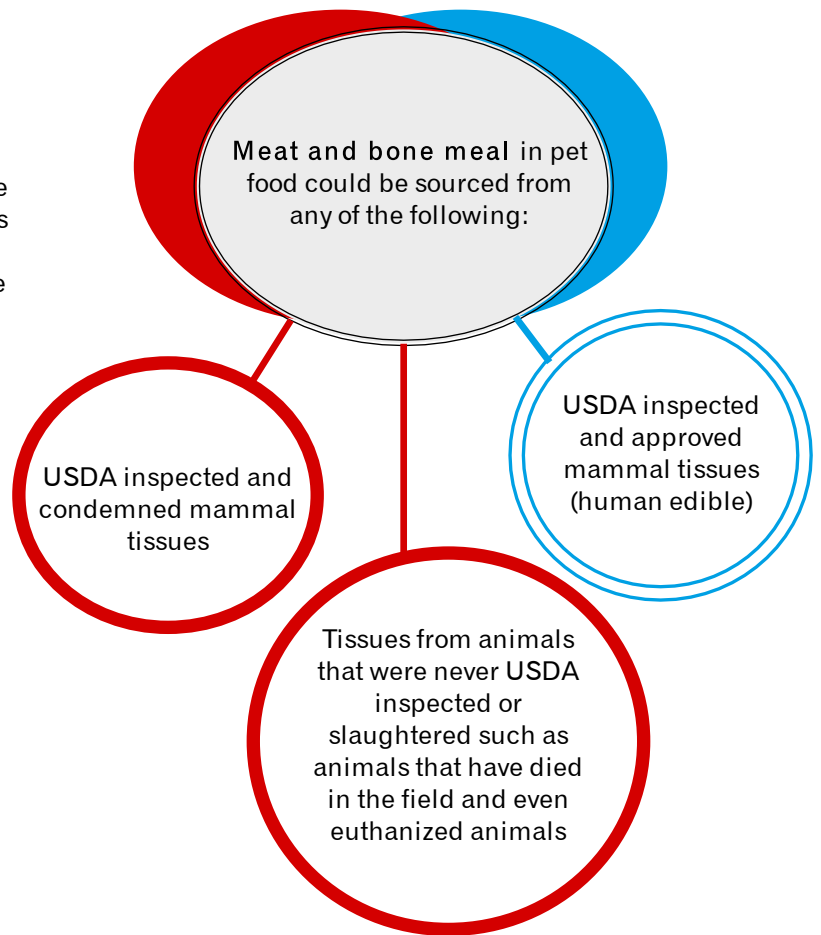
# Pet Food Ingredient Definitions

## Meat and Bone Meal

Beef and bone meal  
Lamb and bone meal  
Pork and bone meal  
Venison and bone meal

A rendered (cooked prior to manufacturing of pet food) ingredient. Meat and bone meal can include the entire slaughtered or non-slaughtered animal carcass or any part of the animal including horn, hoof, hide and intestines with feces (definition allows feces to be included). Any mammal species is allowed in this ingredient.

Meat and bone meal would be stated on the label species specified such as 'Beef and bone meal' or 'Lamb and bone meal' or if it is a combination of animal species would be stated on the label as 'Meat and bone meal'.



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The AAFCO/FDA definition of Meat and bone meal is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that meat and bone meal is sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should ONLY be sourced from USDA inspected and approved animals.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that meat and bone meal be required to be sourced from USDA inspected and approved animals.

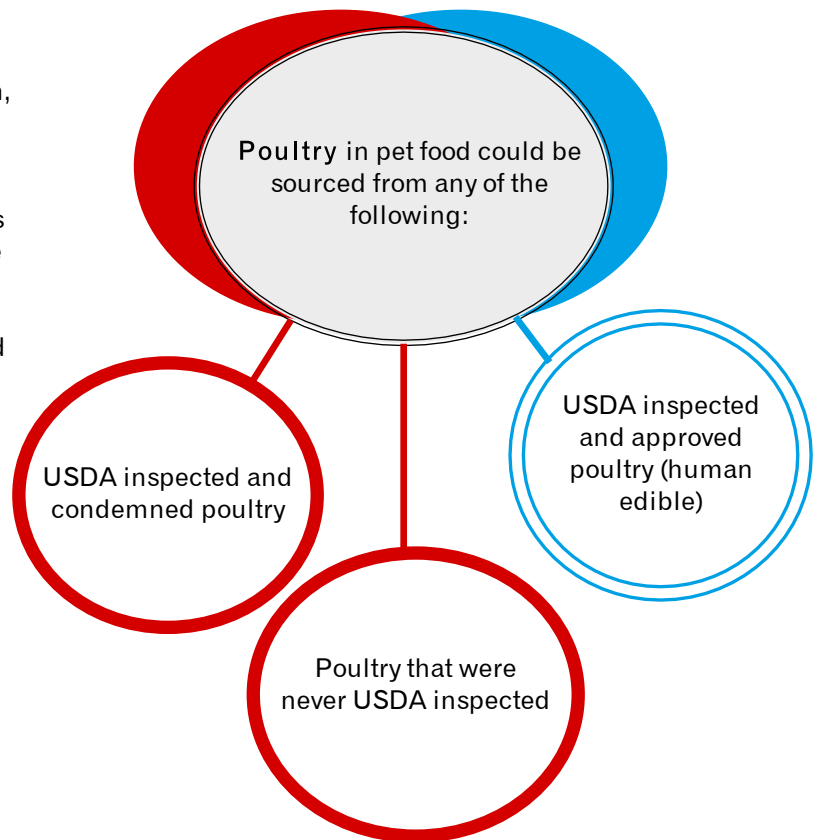
# Pet Food Ingredient Definitions

## Poultry

Chicken  
Turkey

Poultry in pet food can include a combination of flesh, skin and bone from slaughtered poultry. The AAFCO/FDA holds no requirement to what percentage of flesh, skin and/or bone the ingredient contains – it would still be considered poultry if it was majority skin and bones. Poultry is required to be free of feathers, heads, feet, and intestines.

Poultry would be stated on the label species specified such as 'Chicken' or 'Turkey'.



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The AAFCO/FDA definition of Poultry in pet food is required to be sourced from a slaughtered animal, but is not required to be sourced from a USDA inspected and approved slaughtered animal as federal food safety law requires.

**This pet food ingredient is not in accordance with US federal law.**

Take  
Action

Ask your pet food manufacturer for a guarantee - in writing - that poultry are sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animals.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that poultry be required to be sourced from USDA inspected and approved animals.



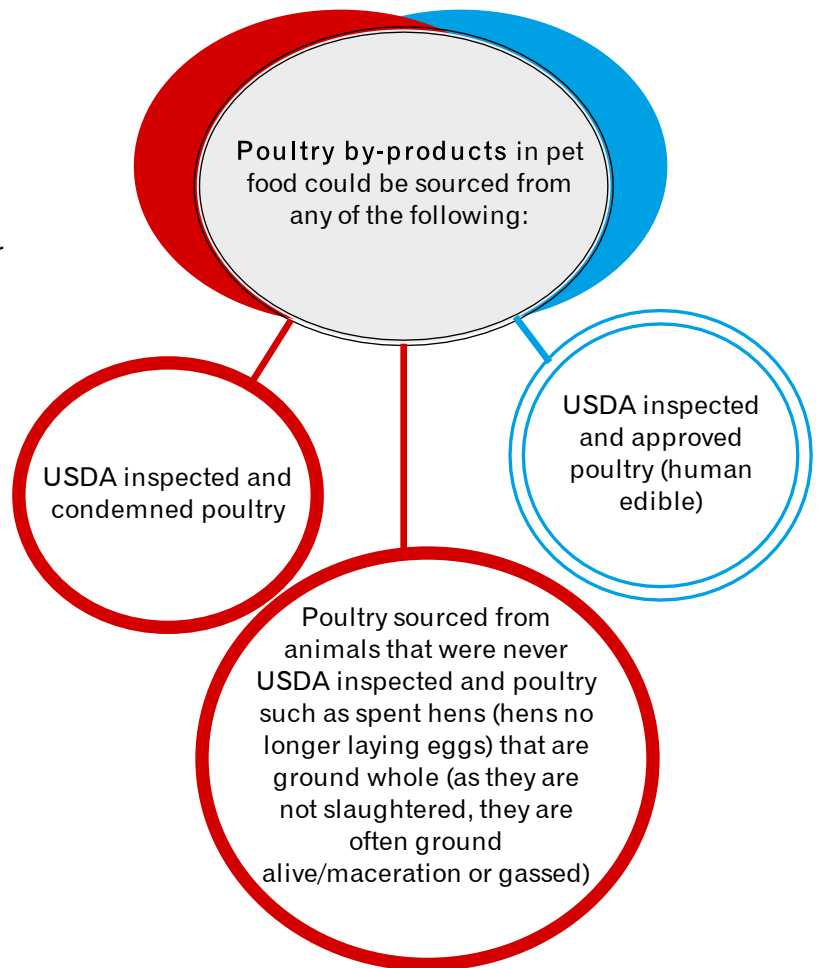
# Pet Food Ingredient Definitions

## Poultry By-Products

Chicken by-products  
Turkey by-products

Poultry by-products in pet food can include slaughtered or non-slaughtered poultry heads, feet, intestines, feathers, or whole carcasses.

Poultry by-products could be stated on the label species specified such as 'Chicken by-products' or 'Turkey by-products' or if it is a combination of animal species would be stated on the label as 'Poultry by-products'.



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The AAFCO/FDA definition of Poultry by-products is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that poultry by-products are sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should ONLY be sourced from USDA inspected and approved animals.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that poultry by-products be required to be sourced from USDA inspected and approved animals.

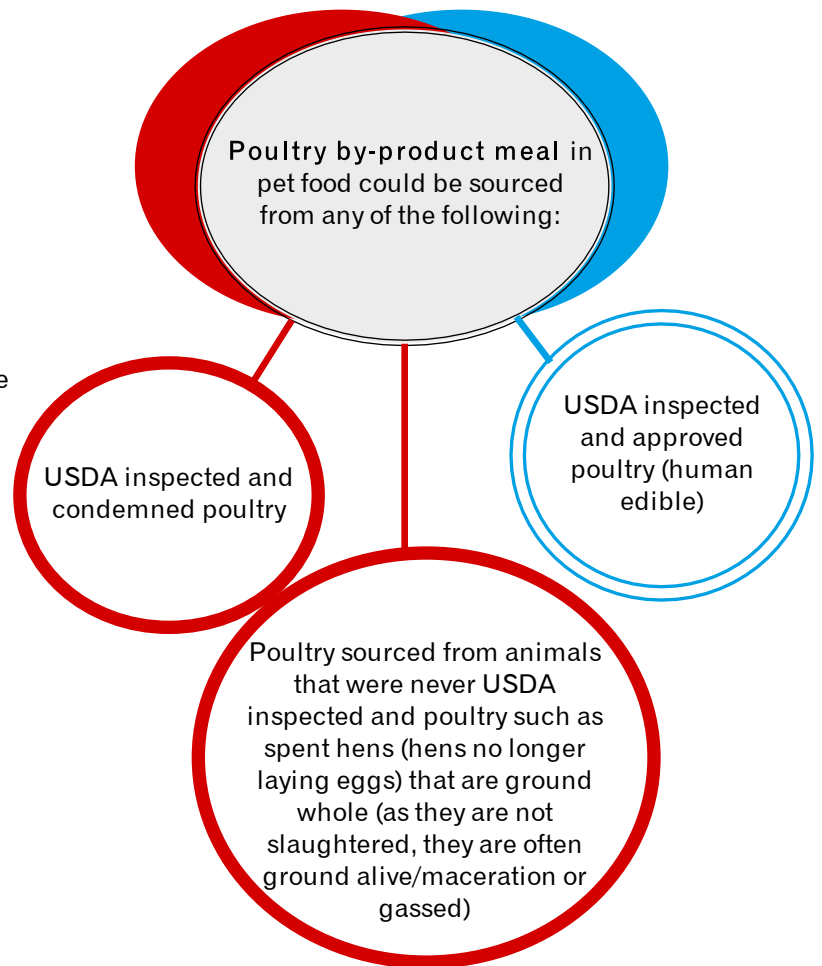
# Pet Food Ingredient Definitions

## Poultry By-Product Meal

Chicken by-product meal  
Turkey by-product meal

A rendered (cooked prior to manufacturing of pet food) ingredient. Poultry by-product meal in pet food can include feathers, heads, feet, undeveloped eggs, intestines or whole carcasses of slaughtered or non-slaughtered poultry.

Poultry by-product meal could be stated on the label species specified such as 'Chicken by-product meal' or 'Turkey by-product meal' or if it is a combination of animal species would be stated on the label as 'Poultry by-product meal'.



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The AAFCO/FDA definition of Poultry by-product meal is not required to be sourced from slaughtered animals.

This pet food ingredient is not in accordance with US federal law.

Take Action

Ask your pet food manufacturer for a guarantee - in writing - that poultry by-product meal is sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should ONLY be sourced from USDA inspected and approved animals.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that poultry by-product meal be required to be sourced from USDA inspected and approved animals.

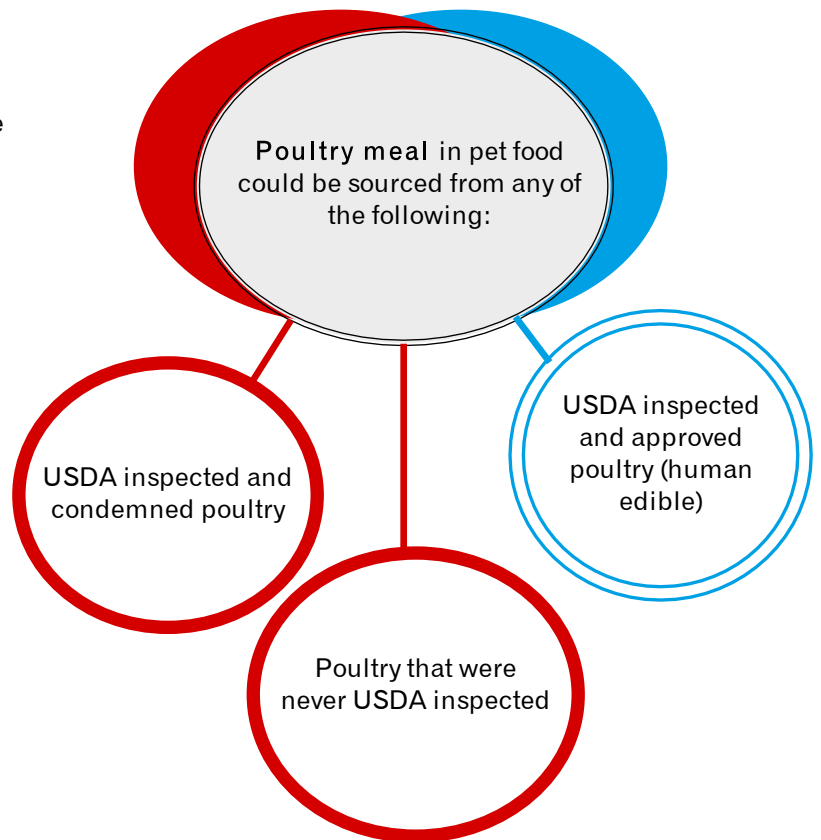
# Pet Food Ingredient Definitions

## Poultry Meal

Chicken meal  
Turkey meal

A rendered (cooked prior to manufacturing of pet food) ingredient. Poultry meal in pet food can include a combination of flesh, skin and bone of slaughtered poultry. The AAFCO/FDA definition holds no requirement to what percentage of flesh, skin and/or bone the ingredient contains – it would still be considered poultry meal if it was majority rendered skin and bones. Poultry meal is required to be free of feathers, heads, feet, intestines.

Poultry meal would be stated on the label species specified such as 'Chicken meal' or 'Turkey meal' or if it is a combination of animal species would be stated on the label as 'Poultry meal'.



The AAFCO/FDA definition of Poultry meal in pet food is required to be sourced from a slaughtered animal, but is not required to be sourced from a USDA inspected and approved slaughtered animal as federal food safety law requires.

**This pet food ingredient is not in accordance with US federal law.**



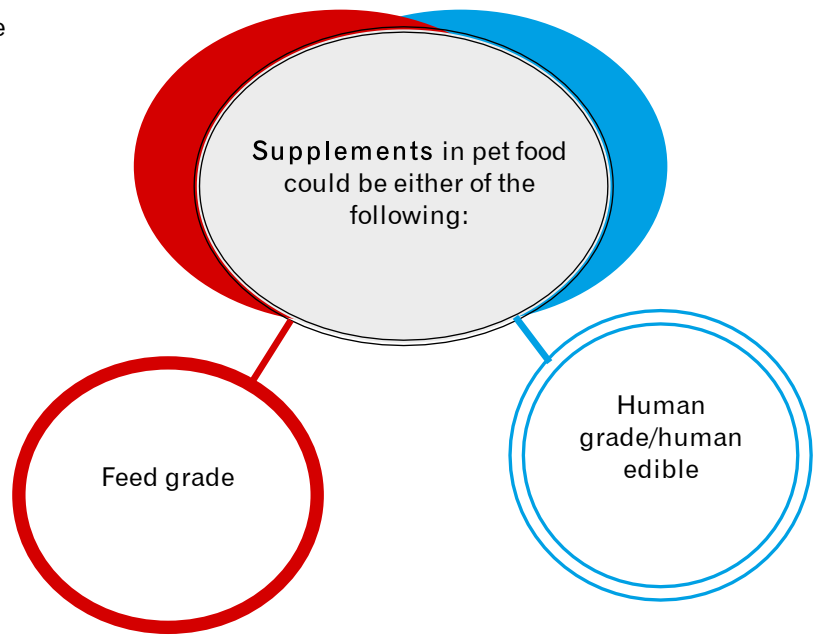
Ask your pet food manufacturer for a guarantee - in writing - that poultry meal is sourced from USDA inspected and approved animals. For safety and quality nutrition, this ingredient should **ONLY** be sourced from USDA inspected and approved animals.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that poultry meal be required to be sourced from USDA inspected and approved animals.

# Pet Food Ingredient Definitions

## Supplements

Pet food supplements are included as feed grade or human grade similar to other ingredients. Feed grade supplements would **ONLY** be suitable for animal consumption and are not required to be manufactured to the same safety standards as human edible/grade supplements.



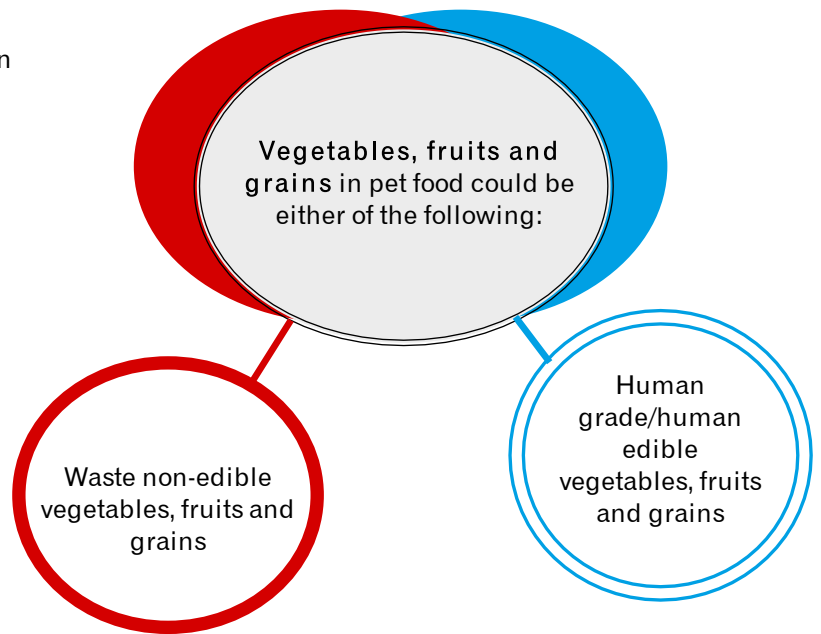
### Take Action

Ask your pet food manufacturer for a guarantee - in writing - that supplements are human grade.

# Pet Food Ingredient Definitions

## Vegetables, Fruits and Grains

The AAFCO/FDA definitions of most vegetable, fruit and grain ingredients are similar to the common understanding of these ingredients with the exception that none are required to be the same quality as human food and none are required to be transported or warehoused the same as human food.



### Take Action

Ask your pet food manufacturer for a guarantee - in writing - that vegetable, fruit and grains are sourced from human edible products. For safety and quality nutrition, these ingredients should **ONLY** be sourced from human edible products.

Ask your State Department of Agriculture to enforce federal law with pet food; ask that vegetable, fruit and grains be required to be sourced from human edible products.