Pet Food Quality and Why it Matters

Pet food quality includes the raw ingredients, nutrients, manufacturing process, and the regulations that monitor these aspects. There are a number of governmental and non-governmental entities including the Food and Drug Administration (FDA), the American Association of Feed Control Officials (AAFCO), and the United States Department of Agriculture (USDA) that play a role in overseeing pet food quality; however, the FDA is the main organization that regulates pet food quality as a whole.

Anything defined as food, which includes animal feed, is governed by the Federal Food, Drug, and Cosmetics Act (FFDCA). The FDA Center for Veterinary Medicine is the regulatory body for pet food and utilizes the regulations set forth by the FFDCA to enforce labeling and processing standards, create policies, and oversee pet food reporting and recalls. The FDA mandates pet food labels contain identification of the product, net quantity statement, name and place of business of the manufacturer or distributor, and the listing of ingredients. Reporting pet foods can be done via the FDA’s Safety Reporting Portal or by contacting the state’s FDA Complaint Coordinator. Identifying information such as the product name and brand, type of container, lot number, expiration date, food storage, etc. are needed when registering a complaint. A description of the problem with the diet is necessary along with information about the pet, if it is believed that consuming the pet food in question has affected the animal’s health. Once a complaint has been made, the FDA will evaluate the information provided and decide the proper course of action. The FDA website contains a more extensive list of helpful information when reporting a product.

AAFCO provides guidelines for ingredients, definitions, nutrient content, and labeling. Regarding labeling, AAFCO guidelines include a calorie statement, guaranteed analysis, nutritional adequacy statement, and feeding directions in addition to what is required by the FDA. This extended list of requirements may be enforced on the state level.

The name and purpose of the product must be present on the principal display panel. The net quantity statement displays the net volume or net weight of the product. The ingredient list expresses all ingredients by weight in descending order. The guaranteed analysis is required by many states to have the crude protein, crude fat, maximum crude fiber, and maximum moisture at the very least. The calorie statement is one of the most recent additions to labeling requirements. The calorie statement must be stated as kilocalories per kilogram and incorporate common household measurements such as kcals per cup. The nutritional adequacy statement substantiates that a diet is intended for supplemental feeding or that the food is complete and balanced for growth, reproduction, adult maintenance or a combination of these life stages. Furthermore, the nutritional adequacy statement states how the product is substantiated, either formulated to meet AAFCO requirements for a life stage or via an AAFCO feeding trial. Lastly, foods labeled as complete and balanced must include feeding directions. Several label claims such as premium, super premium, ultra-premium, gourmet, organic, and human grade exist. Foods labeled as premium, super premium, ultra-premium, and gourmet are not required to be any different or superior to other pet foods.

Regarding organic pet foods, there are no pet food specific regulations for organic claims. Currently, AAFCO defines organic as complying with the USDA National Organic Program (NOP). The USDA NOP is a regulatory program that creates standards for organic products. The USDA Organic Seal can only be placed on products that have met such criteria. There are currently 80 USDA-accredited certifying agents with 48 based in the USA and 32 based abroad that can
provide an organic certification to organizations that comply with the NOP standards. Organic labeling consists of 4 categories, “100 percent organic”, “organic”, “made with organic”, and “specific ingredient listing.” If a product contains all certified organic ingredients, then it may be labeled as “100 percent organic” and use the USDA organic seal. A food product can be labeled as “Organic” and use the USDA organic seal if it contains at least 95% certified organic ingredients. The product may contain a maximum of 5% non-organic ingredients that comply with the National List. A product can be labeled as “Made with Organic...” if it contains at least 70% certified organic ingredients, non-organic ingredients comply with the National List, and agricultural ingredients not required to be organic are produced without excluded methods. Products that contain less than 70% certified organic ingredients cannot include the USDA organic seal. Only ingredients that are certified organic ingredients can be listed as organic in the ingredient list.

“Human grade” is a claim that refers to the product as a whole. All ingredients and the resulting end product must meet the Code of Federal Regulations Title 21 part 117, Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventative Controls for Human Health for Human Foods.

Pet food quality is not only managed externally by governmental and non-governmental organizations but also internally by pet food manufacturers. Companies should have specifications for their raw ingredients and relay these specifications to their vendors. These specifications may include nutrient composition, purity standards, and more. Raw ingredients entering the manufacturing facility should be assessed for salmonella, aflatoxins, nutrient specifications, etc. before entering the manufacturing facility. The raw ingredients should be rejected if they do not meet the manufacture’s specifications. Once food items enter the manufacturing facility, sampling may occur multiple times during the manufacturing process to ensure quality.

Hazard Analysis and Critical Control Points (HACCP) are a significant part of quality control in the manufacturing process. The Food Safety and Modernization Act (FSMA) requires pet food producers to have a HACCP plan; therefore, companies must analyze every aspect of their operation for potential hazards, evaluate each risk, and determine which hazards to place in the company’s written HACCP plan. Once a company decides which hazards will need risk-based preventative controls, critical control points (CCP) should be identified. CCP’s should then be monitored, followed by implementation of corrective actions to determine and correct any issues with executing a CCP. Finally, verification measures ensure a CCP is operating appropriately.

Evaluating the pet food label is an essential step in assessing pet food quality; however, labels supply limited information regarding the quality of the product. Further information can be obtained by contacting the manufacturer directly.