

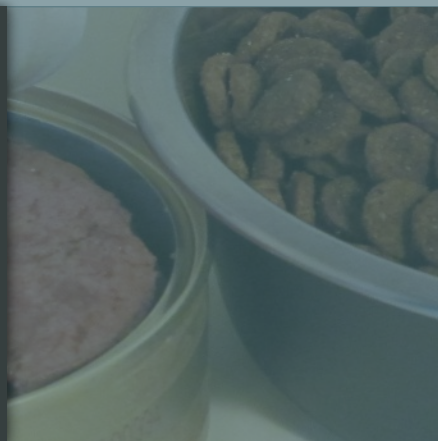
# BEFORE YOU SHOP FOR PET FOOD >



## Association for Truth in Pet Food

This publication is provided by Association for Truth in Pet Food, as education for pet food consumers.

### WHAT YOU NEED TO KNOW



## What to know before you shop for pet food.

### COMPLETE AND BALANCED

Most pet foods are sold as 'Complete and Balanced' nutrition. The claim is extremely misleading.

To be labeled as Complete and Balanced, one of two requirements must be met. 1. The pet food must meet the AAFCO nutritional profiles (for dogs or cats); or 2. The pet food passed an AAFCO certified feeding trial.

Most Complete and Balanced pet foods follow option one above.

The AAFCO nutrient profiles include minimum requirements, with only a few maximums, as needed by cats and dogs. As example, for cat and dog foods there is a minimum requirement of fat, however there is no established maximum for fat. Pet foods with 5% fat and pet foods with 50% fat are both considered 'balanced' nutrition. The same holds true for many other nutrients including vitamins and minerals. Again, the Complete and Balanced claim is misleading to consumers.

AAFCO certified feeding trials are most commonly performed on cats and dogs in kennel laboratory settings; not on pets in real life situations. In recent years, some pet food manufacturers are changing tradition performing feeding trials on real pets in homes.



### All Commercial Pet Foods

Unless the product is noted 'for supplemental feeding', all types of commercial pet food are considered 'complete and balanced'. This statement means the pet food is required to provide your pet with various nutrients as outlined by the Association of American Feed Control Officials (AAFCO) specific to species (cats or dogs). More information on Complete and Balanced on the left of this page.

Only basic nutritional information is provided on the pet food label, stated as 'Crude' (Crude Protein, Crude Fat and Crude Fiber). The term 'crude' defines the basic method of testing used (crude or basic testing) to determine protein, fat, and fiber levels.

### Who Regulates Pet Food

Pet food (in the U.S.) is primarily regulated by the Food and Drug Administration (FDA); specifically the division Center for Veterinary Medicine (CVM). Each State Department of Agriculture has authority over pet food (state law) but all states follow FDA's authority.

The laws that govern pet food are the Federal Food, Drug, and Cosmetic Act, and to a lesser extent state laws written by the Association of American Feed Control Officials (AAFCO). However, many applicable laws are not enforced.

One of the most important things for consumers to know is that pet food is not regulated as food. It is called food

– cat food or dog food – but most do not abide by food laws; most pet 'foods' are not food.

### If it's not food, what is it?

Cat food and dog food are termed 'food', but most are not food as consumers understand the term (food). Through a series of confusing laws and conflicting FDA Policies, most pet foods are regulated as animal feed (such as cattle feed, chicken feed). Animal feed does not follow food safety law; feed is allowed to include anything from wholesome food ingredients to illegal material allowed by FDA to be disposed of in animal food/pet food.

One of the most dangerous, illegal feed/animal food ingredients - allowed by FDA into pet foods - is material sourced from diseased or dead/non-slaughtered animals. Source: FDA Compliance Policy [690.300](#), and FDA Compliance Policy [675.400](#).

Pet foods that meet the requirements of food are classified as human grade pet foods. Human grade pet foods are manufactured in a certified human food facility, include 100% human food quality ingredients (USDA inspected and approved human edible), and include 100% human quality supplements. Human grade pet foods are food, exactly how pet owners are familiar with the term food. 'Human grade' will be stated on the pet food label if the product meets the legal requirements.

Other than human grade pet foods, all

## What to know before you shop for pet food.

### QUESTIONS TO ASK PET FOOD

Are meat, vegetable, grain, and fruit ingredients human edible?

Are supplements human grade or feed grade?

What is the country of origin of all ingredients, including all supplements?

Who manufactures the pet food?

pet foods can include inferior/illegal ingredients; emphasis *can include*. Some, but not all, pet foods utilize inferior/illegal ingredients.

As all pet food labels are required by regulation to look similar, the challenge for pet food consumers is learning which pet foods include inferior/illegal ingredients. Questions found on the left side of this page will help consumers determine the quality of the pet food (ingredients) they are purchasing. Always ask questions of the manufacturer before you purchase.

The following list of pet food ingredients are allowed through legal definition to be sourced from diseased animals or dead/non-slaughtered animals (inferior sources):

- Chicken by-products
- Chicken by-product meal
- Poultry by-products
- Poultry by-product meal
- Meat and bone meal
- Beef and bone meal
- Animal fat
- Animal digest
- Meat meal
- Beef meal
- Lamb meal
- Venison meal

If a pet food contains one of the above ingredients, ask the manufacturer for a guarantee in writing to quality of ingredients. Ask: Are meat ingredients sourced from USDA inspected and approved human edible sources?

### Made in the USA

For pet foods or treats to make the 'Made in the USA' claim, the requirement is the product is manufactured in the U.S., and all ingredients are sourced from the U.S. However, this requirement is not enforced; another misleading marketing trick ignored by regulatory authorities.

### Co-Packer

Some pet food companies manufacture their own brands, some do not. A co-packer is the term used for a manufacturer that makes pet food for another brand. Ask who manufactures the pet food, ask about the recall history of the co-packer.

### Meat Meals

Meat meals are ingredients unique to pet food/animal feed (not used in human food). The term 'meal' means the ingredient has been cooked prior to the cooking process of the pet food. Meat, and commonly bone and internal organs are ground fine and cooked to become a powder-like substance (the meat meal).

Some believe meat meals provide more nutrition as the moisture is removed from the meat (meat contains high levels of moisture). Others believe the high level of processing decreases the nutritional value (cooked once in the processing of the meat meal, cooked twice in the processing of the pet food).

Meat meals are most commonly used



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### PET FOOD NAMES

Just as with pet food ingredients, the names of pet foods can be confusing. Below are explanations to various regulations of pet food product names.

#### Named Meat

If a pet food name is (example) Beef Dog Food or Tuna Cat Food, regulations require the pet food to contain a minimum of 70% of the named meat (moisture removed).

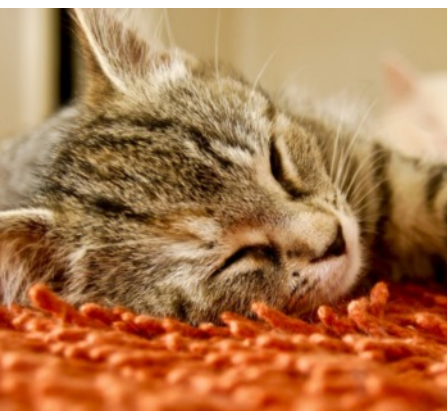
If the pet food name includes two meats (example: Beef and Tuna Pet Food), the pet food is required to contain a minimum of 70% of the two named meats (moisture removed).

#### Dinner, Entree, Formula

If a pet food name includes the words Dinner, Entree, or Formula (example: Beef Dinner for Dogs or Chicken Entree Cat Food) regulations require the pet food to contain a minimum of 10% of the named meat (excluding moisture). If the pet food name includes two meats (Chicken and Liver Dinner), the two meats combined are required to be a minimum of 10% of the food (excluding moisture).

#### With

If a pet food name includes the word With (example: XYZ Pet Food With Beef), regulations require the pet food to contain a minimum of 3% of the named meat.



in kibble pet foods.

### Pretty Pictures are Meaningless

Regulatory authorities ignore labeling laws allowing pet foods to display images of food (grilled steak, roasted chicken) when nothing in the pet food looks similar to the images displayed. Misleading images on pet food labels are a direct violation of federal law and many state laws, but currently no authority enforces those laws. Images of food on pet food labels are in most cases only marketing. Do not allow them to influence your purchase decisions.

### Flavor

Pet foods that include the word 'Flavor' in the name – such as T-bone Steak Flavor – are not required to include the named meat. The only requirement is the pet food to be 'flavored' with the named meat; such as T-bone steak flavor. (See more pet food name regulations left side of this page.)

### Styles of Pet Food Kibble

Kibble pet foods are probably the most popular style of pet food, not because it is superior in nutrition; all commercial pet foods are required to provide the same nutrition. Kibble pet foods are the most popular simply because of convenience. Most kibble pet foods are made via extrusion, a process where ingredients are cooked through pressure and steam. Kibble is cooked again in the drying process

and finally sprayed with flavoring (in most cases) to enhance the taste. Cooking times vary with each manufacturer.

The closest comparison of kibble pet food to human food – in manufacturing process only - is a fortified breakfast cereal (fortified meaning with added vitamins and minerals; as example Total cereal). Cereal is made through a similar extrusion process.

Currently, there are no human grade kibble pet foods. The manufacturing process could become human grade, but thus far no manufacturer has certified their facility.

Kibble pet foods, on average, contain high amounts of starchy carbohydrates. This is required due to the manufacturing process; needed to hold the kibble shape.

It is best to store kibble in its original packaging, bag placed inside an airtight container. Original packaging is required if a pet becomes sick from the food.

Most kibble pet foods have a shelf life between 6 months and 2 years (product is required to stay fresh and provide required nutrition for the duration of the shelf life).

### Canned Pet Food

Canned pet food is similar to human canned food, again – only through the manufacturing process. The pet food is cooked in the can, not prior to canning. Varieties of canned pet foods



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### PET FOOD INGREDIENT QUALITY

Pet food uses a different language than human food. As example, 'chicken' in human food means USDA human edible chicken meat. In pet food 'chicken' can be USDA human edible chicken meat, USDA condemned chicken meat, or chicken skin and bones (no meat).

To make matters a little more challenging for consumers, pet food ingredient definitions are not public information. The AAFCO organization holds control over all pet food ingredient definitions, charging \$100 for access. For consumers to understand the ingredients in pet food, they must pay the \$100 fee or trust the manufacturer.

Consumers should not assume that pet food chicken, or any pet food ingredient is similar to the same ingredient in human food. Ask the pet food manufacturer for a detailed explanation to what type of chicken (or any ingredient) is used in the pet food. Is the meat human edible meat?



include those in loaf style and those as a stew or with gravy.

Some canned pet foods include pieces of actual meat; others contain chunks of fabricated meat. Fabricated meat is an extruded meat product made from meat slurry with added vegetable starches to help hold the desired shape. There is no disclosure on the pet food label to use of fabricated meat. Consumers can learn some information from the ingredient listing to determine if the pet food contains actual meat or fabricated meat. Look for multiple gums (carrageenan, cassia gum) and or multiple starches (gluten, flour, or vegetable proteins).

Cooking/canning times vary with each manufacturer.

Most canned pet foods have a shelf life between 2 and 5 years.

Currently there are no human grade canned pet foods. There are moist pet foods that are human grade, sold frozen in tubs. Because canned foods are so popular in human food, canned pet food could easily become human grade if the manufacturer followed all food regulation (human grade ingredients and supplements). But to our knowledge there are no human grade canned pet foods currently.

#### Other Moist Pet Foods sold frozen or shelf stable packaging

While not as popular as canned pet food, another style of moist pet food is sold frozen or sold in shelf stable

packaging. These products are most often cooked prior to packaging.

Shelf life varies with style, but commonly these products have a shelf life between 6 months and 1 year.

Some of these types of products are human grade, others are not. The packaging will state 'Human Grade' if the pet food meets the legal requirements.

#### Raw Pet Food

Commercial raw pet food is relatively new to the market as compared to kibble and can, but actually this style of pet food is the oldest form of cat and dog food. Long before commercial pet food, both cats and dogs consumed raw prey – such as birds, mice and rabbits.

Raw pet food is highly scrutinized by FDA; the only style of pet food FDA has issued a consumer warning about. FDA's concern is the spread of bacteria; "raw pet food is more likely to be contaminated with disease-causing bacteria, such as *Salmonella* and *Listeria monocytogenes*."

This FDA warning is incorrect and extremely misleading. FDA pet food recall history details many more recalls for dangerous bacteria with kibble foods than raw (millions of pounds of kibble recalled as compared to only thousands of pounds of raw pet food recalled).

Shelf life varies between 6 months and 1 year frozen.

## What to know before you shop for pet food.

### LAWS

The [Federal Food Drug and Cosmetic Act](#) defines food as:

“The term "food" means (1) articles used for food or drink for man or other animals, (2) chewing gum, and (3) articles used for components of any such article.”

The [Federal Food Drug and Cosmetic Act](#) defines an adulterated (illegal) food as (in part):

“(3) if it consists in whole or in part of any filthy, putrid, or decomposed substance, or if it is otherwise unfit for food; or”

“(5) 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;”

However, the FDA openly tells the pet food industry [law will not be enforced](#):

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

Do not assume your choice of pet food contains safe ingredients. Always ask questions; Does this pet food abide by all food laws?



Some raw pet foods are human grade, however achieving the official human grade status is challenging for raw pet food. FDA and the AAFCO require human grade pet foods to be manufactured in a human food facility, but both organizations neglect to recognize the United States Department of Agriculture's (USDA) role in human food. USDA oversees the production of meat. Some raw pet foods are manufactured under constant inspection (same as human food) by USDA. Consumers can ask the manufacturer: was the pet food made under constant USDA inspection and are supplements human grade? If yes, the pet food can be considered human grade.

### Dehydrated or Freeze Dried Pet Food

Both of these styles of pet food are a method used to preserve the food by removing the moisture. Both styles of pet food require the consumer to add moisture back to the food before feeding.

There are human grade options in this category.

### Treats

Treats for cats and dogs are intended as supplemental feeding, never as the sole source of food. The same lack of enforcement of law and inferior quality of ingredients apply to treats. Ask the same questions to a treat manufacturer you would a food manufacturer.

### Sick Pets Linked to a Pet Food

Should your pet become sick or die and you believe the illness or death is linked to a pet food, the incident should be reported to proper authorities. Pet owners can report to FDA online or phone, for information [Click Here](#). Or report to state authorities. To find your state's representatives [Click Here](#). Your veterinarian should report the food incident too.

Do not return the food for a refund, packaging information will be needed for investigation by authorities. All veterinary records relating to your pet's illness should be provided to authorities; should the worst happen, a necropsy will benefit investigators.

## What to know before you shop for pet food.

### WHERE TO PURCHASE YOUR PET FOOD

Locally owned, independent pet food stores are often the only source to purchase human grade pet foods. Many independent stores highly scrutinize the products they carry and most often are well informed about the brands they carry.

### About ATPF

Association for Truth in Pet Food (ATPF) is a consumer association; a pet food consumer stakeholder group. Founder [Susan Thixton](#) represents pet food consumer members at AAFCO pet food regulatory meetings and with FDA.

One of the efforts ATPF has established is a voluntary pet food transparency program titled Pledge to Quality and Origin. To learn more and view Pledges received [Click Here](#).

ATPF members and consumer non-members also performed the largest consumer funded testing of pet food. To view those results [Click Here](#).

Choosing a pet food is one of the most important decisions a consumer must make. [Association for Truth in Pet Food](#) provides this pet food educational document to assist consumers in that decision. This pet food booklet is not all inclusive; we encourage all consumers to continue their education about the products they provide their pet.

### Links

For print versions of this document, below are links provided within.

FDA Compliance Policies  
<http://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074710.htm>

<http://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074717.htm>

Report a sick pet to FDA  
<http://www.fda.gov/AnimalVeterinary/SafetyHealth/ReportaProblem/ucm182403.htm>

Report a sick pet to State  
<http://www.aafco.org/Regulatory>

Association for Truth in Pet Food  
<http://associationfortruthinpetfood.com/>

Susan Thixton  
<http://truthaboutpetfood.com/>

