

### **Guidelines for "Human Grade" Claim**

The following are guidelines for the use of the term "human grade" in the labeling of pet foods and specialty pet foods.

(1) In the AAFCO-defined term "human grade," the use of the term "human grade" is only acceptable in reference to the product as a whole. The feed term specifies that every ingredient and the resulting product must be 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 part 117.

(2) In the definition, the term "human grade" is false and misleading if the product as a whole is not human edible. "Human grade" claims may not be made for individual ingredients in a finished product that does not fully adhere to the manufacturing and ingredient specifications identified above.

(3) In order to substantiate that a "human grade" claim is truthful and not misleading, a manufacturer making one or more "human grade" claims must have documentation that:

A. Each of the individual ingredient suppliers has verified that the individual ingredients supplied to the manufacturer are fit for human consumption.

B. Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for cGMPs for human edible foods as specified in 21 CFR part 117.

C. The manufacturing facility is licensed to produce human food by the appropriate authority. Such evidence shall include, but is not limited to, facility licenses or permits for operation of edible food manufacturing facilities or results of most recent inspections issued by local, county, or state public health authorities;

(4) A pet food or specialty pet food product with "human grade" claims must be clearly labeled for its intended use as animal food, such as "dog food" or "cat treats," and follow all other pet food or specialty pet food labeling requirements. The following also applies to the labeling:

A. Statements of quality or grade may not appear in the ingredient statement.

B. All uses of the words "human grade" on the label can be no larger than the statement of intended use required by Agr 1203.02(a)(2).

C. A claim of "human grade ingredients" is only acceptable if the product complies with Agr 1203.12(a).

D. In order to use the term "human grade" on brochures, point of sale materials, websites, and other marketing materials, the statement of intended use must also be included. All uses of the words "human grade" on labeling can be no larger than the statement of intended use.

